Supreme Court, U. S.
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APPENDIX

IN THE

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1977

Nos. 76-1471, 76-1521, 76-1595, 76-1604, 76-1624, 76-1685

FEDERAL COMMUNICATIONS COMMISSION;
CHANNEL TWO TELEVISION COMPANY, *et al.*;
NATIONAL ASSOCIATION OF BROADCASTERS;
AMERICAN NEWSPAPER PUBLISHERS ASSOCIATION;
ILLINOIS BROADCASTING COMPANY, INC.; and
POST COMPANY, *et al.*,

Petitioners,

v.

NATIONAL CITIZENS COMMITTEE FOR BROADCASTING,
FEDERAL COMMUNICATIONS COMMISSION, and
UNITED STATES OF AMERICA,

Respondents.

ON WRITS OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR
THE DISTRICT OF COLUMBIA CIRCUIT

Volume II – Pages 445-742
EXHIBITS

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January 25, 1937

MEMORANDUM TO THE COMMISSION:

OPINION OF THE GENERAL COUNSEL

In response to request of the Chairman of the Commission.

I.

HAS THE COMMISSION AUTHORITY, AT THE PRESENT TIME, TO DENY AN APPLICATION OF A NEWSPAPER FOR RADIO FACILITIES, ON THE GROUND THAT IT IS AGAINST PUBLIC POLICY.

The question presented is whether the Commission may deny an application of a newspaper for a license on the ground that it is against "public policy." The specific standard, or guide, provided by Congress in the Communications Act of 1934 is whether or not the granting of an application for license is "in the public interest, convenience or necessity." It must be determined at the outset, therefore, whether there is a difference between the term "public policy" and the standard of "public interest, convenience and necessity." We think the two may be distinguished. "Public policy" has been defined as:

> "that principle of law which holds that no one can lawfully do that which has a tendency to be injurious to the public or against the public good."

(Spalding v. Maillet, 188 P. 377; *Georgia Fruit Exchange v. Turnipseed,* 62 So. 542.)

In the sense of the definition given, it might be said that "public policy" is synonymous with "public interest." However, as was said in *Weeks v. New York Life Insurance Company,* 122 S.E. 586,

> "Public policy imports something that is uncertain, fluctuating, varying with the changing economic needs, social customs and moral aspirations of the people. A state has no public policy cognizable by the courts which is not derivable by clear implication from established law as found in its Constitution, statutes, and judicial decisions."

Again, in *Georgia Fruit Exchange v. Turnipseed, supra,* p. 544, the court said:

> "Public policy is broader than the mere terms of the statute or statutes and embraces their general purpose and spirit."

See also *Smith v. San Francisco & N. P. R. Co.,* 47 Pacific 582, 589, where the phrase is defined as follows:

> "Public policy is a term of vague and uncertain meaning, which it pertains to the law-making body to define, and courts are apt to encroach on the domain of that branch of government if they characterize a transaction as invalid because it is contrary to public policy, unless the transaction contravenes some positive statute or some well-established rule of law. * * *"

As was pointed out in *Rast v. Van Deman & Lewis,* 240 U.S. 342, 357:

> "It is the *duty* and *function* of the legislature to discern and correct evils, and by evils we do not mean some definite injury but obstacles to a greater public welfare." (italics supplied)

This case is cited many times in other decisions, and we believe it is authority for the conclusion that a determination of "public policy" is the function of the legislature. Although it may be stated that the Federal Communications Commission is an arm of the Congress, or the agent of that legislative body, yet it is equally true that the Commission possesses only those powers specifically delegated to it by statute. *(Federal Radio Commission v. Nelson Bros. Bond & Mortgage Co.,* 289 U.S. 285).

From the above it would appear that "public policy" is a broader and in some aspects, a different term than "public interest." and that the determination of "public policy" is a function of Congress.

Since the Congress has delegated to the Commission the power to determine whether a grant of an application in any case will serve the "public interest" this is the only standard the Commission can apply, and our inquiry is limited to whether such standard furnishes authority to deny applications from newspapers. We do not mean to infer from the above that the Commission, in applying the standard of "public interest, convenience or necessity" to a given set of facts may not consider as a factor that the applicant before it owns or controls a newspaper.

The Supreme Court, in *Federal Radio Commission v. Nelson Bros. Bond and Mortgage Company, supra,* has defined the standard and indicated some of the limitations upon the power of the Commission:

> "In granting licenses the Commission is required to act as public convenience, interest or necessity requires. This criterion is not to be interpreted as setting up a standard so indefinite as to confer as unlimited power. Compare *N.Y. Central Securities*

Co. v. United States. 287 U.S. 12, 24. The requirement is to be interpreted by its context, by the nature of radio transmission and reception, by the scope, character and quality of services, and, where an equitable adjustment between States is in view, by the relative advantages in service which will be enjoyed by the public through the distribution of facilities."

See also the following language in *N.Y. Central Securities Co. v. United States,* 287 U.S. 24:

"Appellant insists that the delegation of authority to the Commission is invalid because the stated criterion is uncertain. That criterion is the 'public interest.' It is a mistaken assumption that this is a mere general reference to public welfare without any standard to guide determinations. The purpose of the Act, the requirements it imposes, and the context of the provision in question show the contrary."

It should be observed that the application of this standard by the Commission is subject to judicial review under Section 402(b) of the Act. Upon appeal from decisions of the Commission the court will examine the decision for the purpose of determining whether the Commission has stayed within the power thus delegated and therefore its decision was not arbitrary or capricious.

"A finding without substantial evidence to support it—an arbitrary or capricious finding—does violence to the law. It is without the sanction of the authority conferred. And an inquiry into the facts before the Commission, in order to ascertain whether its findings are thus vitiated, belongs to the judicial province and does not trench upon, or involve the exercise of, administrative authority." *Nelson Bros. case, supra,* p. 277.

In my opinion, therefore, the Commission does not have the authority, under the existing law and in the absence of an expression of public policy on the subject by the Congress, to deny an application to a newspaper owner for radio facilities solely upon the ground that the granting of such an application would be against public policy. It is clear, however, that the Commission has the duty of examining the facts in each particular case to determine whether the granting of an application will serve "public interest, convenience or necessity." One fact among others to be considered by the Commission, is the business connections of the applicant, newspaper or other, and in my opinion the Commission has the power to refuse a license to a newspaper owner if upon all the facts before it in a given case the Commission is unable to find that the granting of such an application would serve public interest, convenience, or necessity.

II.

WHETHER LEGISLATION COULD BE PASSED DENYING THE RIGHT OF NEWSPAPERS TO OBTAIN BROADCASTING LICENSES IN THE FUTURE AND REQUIRING THEM TO DIVEST THEMSELVES OF EXISTING RIGHTS IN BROADCAST STATIONS WITHIN A REASONABLE TIME.

It is well settled that all radio broadcasting is within the regulatory power of Congress under the Commerce Clause of the Constitution *(American Bond & Mortgage Company v. United States,* 52 F. (2d) 318; *Federal Radio Commission v. Nelson Bros. Bond & Mortgage Co.,* 289 U.S. 267). This power is "supreme and plenary" (Minnesota Rate Cases, 231 U.S. 352, 398); is "complete in itself, and may be exercised to its utmost extent, and acknowledges no limitations, *other than those prescribed*

in the Constitution." (*Gibbons v. Ogden,* 9 Wheat. 1, 196). And the power to regulate includes the power to prohibit (*The Lottery Cases,* 188 U.S. 321).

It should be determined at the outset whether there exist any constitutional limitations upon the power of Congress to regulate interstate and foreign commerce. It would appear that if such limitations exist they may be found in the First or Fifth Amendments to the Constitution.

The portions of the First Amendment which need be examined in connection with the legislation proposed are as follows: "Congress shall make no law * * * abridging the freedom of speech, or of the press * * *." It is submitted that legislation such as that proposed would constitute no abridgment of freedom of speech or of the press since ownership or control of a radio broadcast station is not essential to the right to speak or the dissemination of news, and the owning or controlling of a broadcast station as a business has nothing to do with the freedom of speech or of the press as such, because the newspaper would still have the same right to communicate by printing or broadcasting, which is enjoyed by any other person or class.

This is demonstrated by the following language from the case of *Trinity Methodist Church, South v. Federal Radio Commission,* 62 Fed. (2d) 850, 853, in which the court affirmed a decision of the Commission refusing to renew the applicant's broadcast license:

> "This is neither censorship nor previous restraint, *nor is it a whittling away of the rights guaranteed by the First Amendment, or an impairment of their free exercise.* Appellant may continue to indulge his strictures upon the characters of men in public office. He may just as freely as ever criticize religious practices of which he does not approve. * * * but he may not, as we think, *demand, of right, the continued use of an instrumentality of commerce for such purposes, or any other, except in subordination to all reasonable rules and regulations Congress, acting through the Commission, may prescribe."* (Italics supplied)

Moreover, the freedom of the press is not abridged by a reasonable regulation of commerce promulgated by the Congress under constitutional authority for the protection of all the people, including the press.

In *Toledo Newspaper Co. v. U.S.,* U.S. 402, 419, Chief Justice White, speaking for the court, dismissed the argument that a law providing for the punishment of contempts of court which obstructed justice was an interference with freedom the press, in the following language:

> "We might well pass the proposition by because to state it is to answer it, since it involves in its very statement the contention that *the freedom of the press* is the freedom to do wrong with impunity and *implies the right to frustrate and defeat the discharge of those governmental duties upon the performance of which the freedom of all, including that of the press, depends."* (Italics supplied)

Chief Justice Fuller, in the case entitled *In re: Rapier,* 143 U.S. 110, 134, said:

> "We cannot regard the right to operate a lottery as a fundamental right infringed by the legislation in question; *nor are we able to see that Congress can be held, in its enactment, to have abridged the freedom of the press. The circulation of newspapers is not prohibited, but the government declines itself to become an agent in the circulation of printed matter which it regards as injurious to the people.* The free-

dom of *communication* is not abridged within the intent and meaning of the constitutional provision unless Congress is absolutely destitute of any discretion as to what shall or shall not be carried in the mails, and compelled arbitrarily to assist in the dissemination of matters *condemned by its judgment, through the governmental agencies which it controls." (Italics supplied)*

Inasmuch as the granting of a license to operate a broadcast station does not give the licensee any vested property right *(American Bond & Mortgage Company v. United States,* 52 Fed. (2d) 318), (Sections 304 and 309(b) of the Communications Act of 1934) and since broadcast licenses must be renewed every six months, each appliation for renewal thereof being considered *de novo,* the right to hold or acquire property does not appear to be involved. For the same reasons the constitutional question presented in considering the power of Congress to deny newspapers the right to acquire broadcast stations in the future is not different from that presented as to its power to require them to divest themselves of the control of such stations within a reasonable time.

That protection of a person or class of persons to equality under the law exists under the Fifth Amendment is clearly indicated in the lineof decisions noted herein; In In the case of *U.S.* v. *Yount,* 267 F. 861, the court said, in discussing the power of Congress to "classify" as incidental to its power to regulate commerce:

"The 'due process of law' by which Congress is limited in the Fifth Amendement and the states by the Fourteenth Amendment is equivalent to the 'law of the land' and is intended to protect the citizen against arbitrary action, and secure *to all persons equal and impartial justice under the law.* (Italics supplied). Davidson v. New Orleans, 96 U.S. 97, 24

L. ed. 616; Missouri Pacific Ry. v. Humes, 115 U.S. 512, 6 Sup. Ct. 110, 29 L. ed. 463.

"It seems reasonably clear that the 'due process of law' provision of the Fifth Amendment is broad enough in its scope and purpose to include the 'equal protection of the Laws' which no state may deny to any person under the provisions of the Fourteenth Amendment. Leeper v. Texas, 139 U.S. 462, 11 Sup. Ct. 577, 35 L. ed. 225; Giozza v. Tiernan, 148 U.S. 657, 12 Sup. Ct. 721, 37 L. ed. 599."

In *Nebbia* v. *U.S.,* 291 U.S. 502, the court observed (Page 536):

"It is clear that there is no closed class or category businesses of affected with a public interest, and the function of courts in the application of the Fifth and Fourteenth Amendments is to determine in each case whether circumstances vindicate the challenged regulation as a reasonable exertion of governmental authority or condemn it as arbitrary or discriminatory. Chas. Wolff Packing Co. *v.* Court of Industrial Relations, 262 U.S. 522, 535, 67 L. ed. 1103, 1108, 43 S. Ct. 630, 27 A.L.R. 1280."

In stating that "Classification is allowable under the provisions of the Constitution" the court in the case of *U.S. v. Yount, supra,* cited the case of *Gulf Colorado & Santa Fe Railway v. Ellis,* 165 U.S. 150. In this latter case the court said, at page 165, that the classification "must always rest upon some difference which bears a reasonable and just relationship to the act in respect to which the classification is proposed and can never be made arbitrarily and without any such basis."

The above cases indicate that classification is a necessary adjunct to the power to regulate. Since the proposed legislation would be a regulation of interstate commerce,

and since it would discriminate against a class, the precise question involved is (*whether the power of Congress to make such a regulation is limited by the due process clause.*

It would appear well settled that Congress, in the exercise of its power to regulate interstate commerce, may interfere indirectly with private rights which otherwise might be protected by the due process clause. In *Knox v. Lee* (Legal Tender Cases), 79 U.S. 457, it is said:

> 'That provision (due process clause) has always been understood as referring only to a direct appropriation and not to consequential injuries resulting from the exercise of lawful power. It has never been supposed to have any bearing upon or to inhibit laws that indirectly work harm or loss to individuals."

See aslo *United States v. Joint Traffic Ass'n.*, 171 U.S. 505; *Addyston Pipe & Steel Co. v. United States*, 175 U.S. 211; *United Bridge Co. v. United States*, 204 U.S. 365: *Willoughby on Constitutional Law*, 2nd Ed. Sections 1225, 1227, Vol. 3, pp. 1857, 1861.

The criterion which must be applied is whether the legislative action has a reasonable relation to a purpose which is within Congressional authority. This principle is enunciated in the case of *Lewis Publishing Company v. Morgan*, 229 U.S. 288, wherein the legality of certain conditions imposed by Congress on the eligibility to use the second class mails was attacked on the ground that it violated both the First and Fifth Amendments. The court held that Congress by establishing "second class" postal matter was giving effect to a policy of favoring a wide spread circulation of newspapers, periodicals, etc., "in the interest of dissemination of current intelligence." The criterion applied by the Court in considering the validity of the legislation is

indicated by the following exerpt, page 314, of the opinion:

> "The question therefore is only this, Are the conditions which were exacted incidental to the power exerted of conferring on the publishers of newspapers, periodicals, etc., the privileges of the second class classification or are they so beyond the scope of the exercise of that power as to cause the conditions to be repugnant to the Constitution? We say this is the question since necessarily if the power exists to legislate by discriminating in favor of publishers, the right to exercise that power, carries with it the authority to do those things which are incidental to the power itself or which are plainly necessary to make effective the principal authority when exerted. In other words, from this point of view, the illuminating rule announced in McCulloch *v.* Maryland and Gibbons v. Ogden, governs here as it does in every other case where an exertion of power under the Constitution comes under consideration. The ultimate and narrow question therefore is, are the requirements of the provision in question incidental to the purpose intended to be secured by the second class classification?"

The court sustained the conditions as being "incidental and necessary to the complete fruition of the public policy lying at the foundation of the privileges accorded."

Thus, it may be seen that if the proposed legislation denying newspaper owners the right to own or control a broadcast station has a reasonable relationship to a purpose which Congress has the power under the commerce clause to accomplish, then the incidental or indirect interference with personal liberty is not repugnant to the First or Fifth Amendments.

Further, this test which the Courts may apply as to *whether there is a reasonable relationship between the purpose and the means used to accomplish it,* must be clearly distinguished from the question as to the *wisdom of the end sought to be accomplished, or the policy adopted by Congress, power over which is vested solely within the legislative branch of the Government.*

In the Lottery case, supra, this principle was stated as follows:

> "In determining the character of the regulations to be adopted, Congress has a large discretion which is not to be controlled by the courts simply because in their opinion such regulations may not be the best or most effective that could be employed."

This principle is even more clearly stated in the case of *Northern Securities Co. v. United States,* 193 U.S. 197, which involved legislation of much the same class as that under consideration. The law in question was the provision of the Sherman Anti-Trust Act which prohibited "every combination" etc., in "restraint of trade." The fact that the purpose of the act was to prevent restraints of trade brought it within the power delegated to Congress under the Commerce clause, but the objection was made that it interfered with the "liberty" to contract which is guaranteed by the Fifth Amendment. The Court said:

> "The means employed in respect of the combinations forbidden by the Anti-Trust Act, and which Congress deemed germane to the end to be accomplished, was to prescribe as a rule for *interstate and international commerce.* (Not for domestic commerce.) that it should not be vexed by combinations, conspiracies or monopolies which restrain commerce by destroying or restricting competition.

> We say that Congress has prescribed such a rule, because in all the prior cases in this court the Anti-Trust Act has been construed as forbidding any combination which by its necessary operation destroys or restricts free competition among those engaged in interstate commerce; in other words, that to destroy or restrict free competition in interstate commerce was to restrain such commerce. Now, can this court say that such a rule is prohibited by the Constitution or is not one that Congress could appropriately prescribe when exerting its power under the commerce clause of the Constitutions? Whether the free operation of the normal laws of competition is a wise and wholesome rule for trade and commerce is an economic question which this court need not consider or determine. Undoubtedly, there are those who think that the general business interests and prosperity of the country will be best promoted if the rule of competition is not applied. But there are others who believe that such a rule is more necessary in these days of enormous wealth than it ever was in any former period of our history. Be all this as it may, Congress has, in effect, recognized the rule of free competition by declaring illegal every combination or conspiracy in restraint of interstate and international commerce. As in the judgment of Congress the public convenience and the general welfare will be best subserved when the natural laws of competition are left undisturbed by those engaged in interstate commerce, and as Congress has embodied that rule in a statute, that must be, for all, the end of the matter, if this is to remain a government of laws, and not of men." (pp. 337-338)

It would appear from these cases that if Congress sees fit to declare a policy to be followed in the regulation of interstate commerce (broadcasting) and provides that in

order to carry out that policy, no newspaper shall operate a broadcasting station, the Courts will not question the wisdom of the policy, but will consider such legislation *only* for the purpose of determining whether the prohibition has a reasonable relation to, or is a reasonable means of accomplishing an end which is within the regulatory power of Congress.

Factors which would militate against holding arbitrary or unreasonable the regulation of interstate commerce as herein proposed are the actual facts and usages attendant upon joint ownership and operation of a broadcast station and a newspaper.

It is submitted that these factors should not be examine for the purpose of passing on the wisdom of the legislation but only for the purpose of determining whether an unreasonable or arbitrary classification has been made. *Chicago, B. & Q. R. R. Co. v. McGuire,* 219 U.S. 549. In that case the court said at page 569:

> " * * * The scope of judicial inquiry in deciding the queston of *power* is not to be confused with the scope of legislative considerations in dealing with the matter of *policy*. Whether the enactment is wise or unwise, whether it is based on sound economic theory, whether it is the best means to achieve the desired result, whether, in short, the legislative discretion within its prescribed limits should be exercised in a particular manner, are matters for the judgment of the legislature, and the earnest conflict of serious opinion does not suffice to bring them within the range of judicial cognizance."

It is conceivable, that situations might arise where the mutual control of a newspaper and a broadcast station would have no effect upon the operation of the station in the public welfare. If this be true, would an act barring

every newspaper from owning or operating a broadcast station exceed the end to be accomplished? This question arose in connection with the Anti-Trust Act, supra, which prohibited *"every"* contract in restraint of trade. Prior to the Standard Oil case, 221 U.S. 1, the Supreme Court consistently held that when Congress said *"every"* it laid down a *policy* which the Court could not question, and the act, so interpreted, was held to be constitutional *(Addyston Pipe & Steel Co. v. United States.* 175 U.S. 211; *Northern Securities Co. v. United States, supra.).* In the Standard Oil case, 221 U.S. 1, the Court established the well-known "Rule of Reason" which was applied in that and later cases. The different interpretation of the Anti-Trust Act, however, appears to have been based upon what the Court considered to be the common law concept of the term "restraint of trade" as used in the Act. The Court said:

> " * * * It is certain that these terms ('Restraint of trade' and 'monopoly') at least in their rudimentary meaning, took their origin in the common law, and were also familiar in the law of this country prior to and at the time of the adoption of the act in question.
>
> "We shall endeavor, then, first to seek their meaning, * * * by making a very brief reference to the elementary and indisputable conceptions of both the English and American law on the subject prior to the passage of the Anti-Trust Act."

While the interpretation placed upon the Act in the *Standard Oil case, supra,* might be said to weaken the former decisions as to the constitutionality of the Act as originally construed, it did not constitute a reversal of the former cases as to such constitutionality; but rendered a consideration of the question unnecessary.

Other analogous legislation is contained in Section 1, Paragraph 8 of the Inerstate Commerce Act commonly known as the "Commodities Clause" which provides that:

> "From and after May 1, 1908, it shall be unlawful for any railroad company to transport from any state, * * * any article or commodity, other than timber and the manufactured products thereof, manufactured, mined, or produced by it, or under its authority, or which it may own in whole or in part, or in which it may have any interest, direct or indirect, except such articles or commodities as may be necessary and intended for its use in the conduct of its business as a common carrier."

This clause was held constitutional by the Supreme Court of the United States in the cases of *U.S. v. Delaware & Hudson Co.*, 213 U.S. 366 and *Delaware L. & W. R. R. Co. v. U.S.*, 231 U.S. 363.

In the former case the Government sought to enjoin five railroads from shipping coal over their lines. Some of these corporations owned and worked mines and transported over their own rails in interstate commrce the coal so mined either for their own account *or for the account of those who had acquired title to the coal prior to the beginning of the transportation.* As to this last group, the Government contended that the Act prohibited the carrying of any coal with which the line was formerly connected regardless of present ownership. One of the main defenses the companies claimed, on the other hand, was that the Act was unconstitutional because it deprived them of property without Due Process. The court pointed out that the broad interpretation contended for by the government would raise serious constitutional questions; that where an act is susceptible of two interpretations one of which would be constitutional and the other not, the construction upholding the validity of the law should be applied; and, therefore, construed the Act as applying only where there was an actual and a present connection between the company and the commodity. It was then concluded:

> "We think it unnecessary to consider at length the contentions based upon the due process clause of the Fifth Amendment, * * * When, however, mere forms of statement are put aside and the real scope of the argument at bar is grasped, we think it becomes clear that in substance and effect the argument really asserts that the clause as construed by the Government is not a regulation of commerce, since it transcends the limits of regulation and embraces absolute prohibitions, which, it is insisted, could not be exerted in virtue of the authority to regulate. The whole support upon which the propositions and the arguments rest hence disappear as a result of the construction which we have given the statute. Through abundance of caution we repeat that our ruling here made is confined to the question before us. Because, therefore, in pointing out and applying to the statute the true rule of construction, we have indicated the grave constitutional questions which would be presented if we departed from that rule, we must not be considered as having decided those questions. We have not entered into their consideration, as it was unnecessary for us to do so."

The *Delaware L. & W. case, supra*, involved a question as to whether a shipment of hay to be used in feeding mules in mines owned by the defendant railroad was a violation of the Commodities Act. The railroad challenged the constitutionality of the Act and contended inter alia that, "It is a matter of complete indifference

to the public * * * whether or not the railroad company does or does not engage in such transportation, so long as it continues lawfully to own and operate its mines, and the Commodities Clause in prohibiting such transportation has no reasonable relationship to the accomplishment and any legitimate public object, but is arbitrary, unreasonable and unnecessary and violates the Fifth Amendment." The court in holding that the Act did have a reasonable relationship to the regulation of interstate commerce said:

> "But the courts are not concerned with the question as to whether, in a particular case, there had been any discrimination against shippers or harm to other dealers. The statute is general and applies not only to those particular instances in which the carrier did use its power to the prejudice of the shipper, but to all shipments which, however innocent in themselves, come within the scope and probability of the evil to be prevented."

In making an analogy between these two cases and the question under consideration, the *Delaware and Hudson* case might be advanced as authority for the contention that a statute denying the right of *all* newspapers to operate radio stations would be unconstitutional as applied to an extreme situation; for instance, in a case where the owner of a Farmers' Weekly in Minnesota applied for a license to operate a station in Washington, D.C.

However, the above quoted language from the *Delaware L. & W.* case is authority for the conclusion that if there is a reasonable relationship between the prohibition of mutual control of radio facilities and newspapers the courts would not be concerned with the question as to whether in a particular case such mutual ownership was actually detrimental to the operation of the station.

While the above mentioned authorities relative to legislation similar to that contemplated serve to establish the criterion which would be applied in testing the validity of the proposed statute, it is submitted that they afford no basis for a positive conclusion as to its constitutionality.

Section 11 of the Panama Canal Act of August 24, 1912, 37 Stat. 560, made it unlawful for any railroad or other carrier to own, operate, etc. "any common carrier by water operating through the Panama Canal or elsewhere with which such railroad or other carrier does or might compete for traffic or any vessel carrying freight or passengers on such water route or elsewhere with which such railroad or other carrier competes or might compete." This Act further provided that the Interstate Commerce Commission should determine the extent or possibility of competition. A date was specified on which all common ownership should cease, but it was also provided that the Commission should determine whether any "such existing specified service" was being operated in the public interest, etc., and empowered it to grant extensions to those which were challenged to such consideration upon the merits of the individual case. The constitutionality of this legislation has not been successfully challenged to date. See *Lehigh Valley Railroad Co. v. U.S.* (Dist. Ct. E. Dist. Pa. May 12, 1916, 234 F. 682).

Legislation similar to the type contemplated herein is found in Sections 310(a) and 311 of the Communications Act of 1934 wherein the Commission is directed to refuse to grant a license to an enumerated class of persons, among them being aliens, representatives of foreign governments, foreign corporations, etc., and also any person found guilty of unlawful monopoly, as defined therein.

The proposed legislation would impose a prohibition against a class, i.e., newspaper owners, and, in that

respect, would be analogous to Section 310(a) of the present act which contains a similar prohibition against aliens.

Senator Wheeler inquires:

> "Whether, if the Commission has not such authority at the present time, legislation could be passed denying the right for all newspapers to acquire radio stations in the future and requiring all newspapers within a reasonable time to divest themselves of the ownership and control of such stations."

A careful review of the decisions of the Supreme Court with respect to existing legislation whch appears to be analogous or similar to that here suggested and those decisions with respect to the regulation of interstate commerce by the Congress and matters bearing a reasonable relation thereto, impel me to a conclusion that the constitutionality of an act of Congress denying the right to all newspaper owners as such to obtain broadcast licenses in the future and requiring all newspapers to divest themselves of such ownership or control within a reasonable time, is not free from doubt, and, therefore, I think the inquiry does not permit of a categorical answer.

However, let me add, it is established that all radio broadcasting is interstate commerce; that, under the Constitution, the Congress has the power to regulate interstate and foreign commerce; that the criterion to be applied is whether the proposed legislation has a reasonable relation to a purpose which is within constitutional authority; and, that the power to regulate interstate and foreign commerce is limited only by the provisions of the Constitution itself.

I am of the opinion that the mutual ownership and control of newspapers and broadcast stations bears a reasonable relation to and has an effect upon interstate commerce and, therefore, if the Congress enacted a law of the purport suggested, it should meet the constitutional requirements.

[M. H. Seiden & Associates, Inc., "Mass Communications in the United States—1970," Summary Volume (1971) (research conducted on behalf of the National Association of Broadcasters)]

ALPHABETIC GUIDE

Market	Rank
Aberdeen	83
Abilene-Sweetwater	136
Ada	172
Albany, Ga.	148
Albany-Schenectady-Troy	38
Albuquerque	81
Alexandria, La.	164
Alexandria, Minn.	157
Altoona	75
Amarillo	92
Ardmore-Ada	172
Asheville	41
Atlanta	18
Augusta	90
Austin, Texas	129
Bakersfield	134
Baltimore	16
Bangor	149
Baton Rouge	96
Bay City	52
Beaumont-Port Arthur	107
Bellingham	190
Billings	159
Biloxi	178
Binghamton	112
Birmingham	33

Market	Rank
Bismarck	128
Bluefield	153
Boise	146
Boston	6
Bristol-Johnson City	85
Buffalo	22
Burlington-Plattsburgh	114
Butte	181
Cadillac	145
Cape Girardeau (Paducan-Harrisburg)	77
Carthage	155
Casper-Riverton	176
Cedar Rapids-Waterloo	72
Champaign-Decatur-Springfield	69
Charleston, S.C.	113
Charleston-Huntington, W.Va.	31
Charlotte	35
Chattanooga	79
Cheyenne	156
Chicago	3
Chico-Redding	142
Cincinnati	20
Clarksburg-Weston	166
Cleveland	8
Colorado Springs-Pueblo	110
Columbia, S.C.	100
Columbia-Jefferson City	126
Columbus, Ga.	99
Columbus, Miss.	162
Columbus, Ohio	36
Corpus Christi	121
Dallas-Ft. Worth	12
Davenport (Rock Island-Moline)	66

Market	Rank
Dayton	44
Daytona Beach	50
Decatur, Ala.	106
Decatur, Ill.	69
Denver	32
Des Moines	65
Detroit	7
Dothan	152
Duluth (Superior)	89
Durham	68
Eau Claire	135
El Dorado	109
El Paso	104
Elkhart	87
Ensign	201
Erie	139
Eugene	132
Eureka	174
Evansville	88
Fargo	95
Flint-Saginaw-Bay City	52
Florence, Ala.	106
Florence, S.C.	150
Fort Myers	185
Fort Smith	158
Fort Wayne	84
Fort Worth	12
Fresno-Visalia	67
Glendive	204
Grand Junction (Montrose)	182
Grand Rapids-Kalamazoo	37
Great Falls	163
Green Bay	73

Market	Rank
Greensboro-Winston Salem (High Point)	53
Greenville-Spartanburg--Asheville	41
Greenville-New Bern-Washington	74
Greenwood	175
Hampton	46
Harrisburg-York-Lancaster-Lebanon	48
Harrisonburg, Va.	187
Hartford-New Haven	21
Hastings	80
Hattiesburg	165
Hays	194
Helena	202
Houston	14
Huntington	31
Huntsville-Decatur-Florence	106
Idaho Falls-Pocatello	160
Indianapolis	15
Jackson, Miss.	71
Jackson, Tenn.	203
Jacksonville	60
Jefferson City	126
Johnson City	85
Johnstown-Altoona	75
Joplin (Pittsburg, Kan.)	119
Kalamazoo	37
Kansas City	25
Kearney	80
Klamath Falls	197
Knoxville	61
La Cross-Eau Claire	135
Lafayette, La.	120
Lake Charles	167
Lancaster	48

Market	Rank
Lansing	97
Laredo	196
Las Vegas	143
Laurel-Hattiesburg	165
Lawton	103
Lebanon	48
Lexington	124
Lima	184
Lincoln-Hastings-Kearney	80
Little Rock	56
Los Angeles	2
Louisville	40
Lower Rio Grande Valley (McAllen-Brownsville, Weslaco)	141
Lubbock	125
Lufkin	195
Lynchburg	63
Macon	133
Madison	108
Mankato	170
Marquette	168
Mason City	137
Medford	173
Memphis	24
Meridian	151
Miami	19
Midland	127
Milwaukee	23
Minneapolis-St. Paul	13
Minot-Bismarck	128
Missoula	193
Mobile-Pensacola	62
Monroe-El Dorado	109

Market	Rank
Monterey	93
Montgomery	115
Nashville	28
New Bern	74
New Haven	21
New Orleans	34
Newport News	46
New York City	1
Norfolk-Portsmouth-Newport News-Hampton	46
North Platte	199
Odessa-Midland	127
Oklahoma City	42
Omaha	64
Orlando-Daytona Beach	50
Ottumwa (Kirksville)	171
Panama City	191
Pembina	200
Pensacola	62
Peoria	86
Philadelphia	4
Phoenix	45
Pittsburgh	10
Plattsburgh	114
Pocatello	160
Poland Spring, Me.	78
Port Arthur	107
Portland, Ore.	26
Portland-Poland Spring, Me.	78
Portsmouth	46
Presque Isle	188
Providence	30
Pueblo	110
Quad City	66

Market	Rank
Quincy (Hannibal)	122
Raleigh-Durham	68
Rapid City	169
Redding	142
Reno	154
Richmond	57
Roanoke-Lynchburg	63
Rochester-Mason City (Austin)	137
Rochester, N.Y.	70
Rockford	98
Roswell	179
Sacramento-Stockton	29
Saginaw	52
St. Joseph	161
St. Louis	11
St. Paul	13
St. Petersburg	27
Salinas-Monterey	93
Salisbury	186
Salt Lake City	49
San Angelo	189
San Antonio	47
San Diego	39
Santa Barbara	147
Savannah	131
Schenectady	38
Scranton	58
Seattle-Tacoma	17
Shreveport-Texarkana	55
Sioux City	116
Sioux Falls-Aberdeen	83
South Bend-Elkhart	87
Spartanburg	41

Market	Rank
Spokane	76
Springfield, Ill.	69
Springfield, Mo.	94
Springfield, Mass.	82
Steubenville	101
Stockton	29
Sweetwater	136
Syracuse	43
Tacoma	17
Tallahassee	138
Tampa-St. Petersburg	27
Temple	102
Terre Haute	105
Toledo	59
Topeka	130
Traverse City-Cadillac	145
Troy	38
Tucson	111
Tulsa	51
Tupelo	198
Twin Falls	183
Tyler	177
Utica	118
Visalia	67
Waco-Temple	102
Washington, D.C.	9
Washington, N.C.	74
Waterloo	72
Watertown-Carthage	155
Wausau-Rhinelander	144
West Palm Beach	91
Wheeling-Steubenville	101
Wichita	54

Market	Rank
Wichita Falls-Lawton	103
Wilkes-Barre-Scranton	58
Wilmington	140
Winston-Salem	53
Yakima	123
York	48
Youngstown	117
Yuma	180
Zanesville	192

METHODOLOGY

Objective Of This Study

The objective of this study is to identify all of the commercial media used in mass communications in the United States and organize them by market and by ownership. The following are the types of media that are included:

Code	Medium
T	Commercial Television
A	Commercial Radio: AM
C	Commercial Radio: AM/FM
F	Commercial Radio: FM
R	Commercial Radio: established since 1966
N	Daily Newspapers
W	Weekly Newspapers
M	Nationally Distributed Magazines (Selected)

Its Organization

This study consists of four volumes. The first is a statistical summary of each of the 204 markets which

encompasses all of the counties and cities in the continental United States. Volumes two through four are the director volumes in whch are listed by name, the owners of the media originating in (marked with an asterisk) or reaching into (from outside) each market, and the properties that constitute their holdings. Most of the properties are accompanied by a rough measure of their "reach" or audience, expressed in terms of the absolute number of homes reached in that market and in the share of the market that this circulation represents. The markets themselves are ranked in declining order of size based on the number of homes in the market.

Selecting the Media

All forms of mass communications except educational television, educational radio, and CATV systems were included. CATV systems, for the most part, did not originate programs during the 1969-70 period covered by this study, and data were not available for educational media although they now constitute a major source of programming. To the extent that CATV systems bring distant signals into a market, their effect is included in the surveys of television viewing reported by American Research Bureau (ARB), whose data were employed in this study.

Magazines were restricted to 50 that met the following three criteria:

(1) They are avilable nationwide;
(2) They relate in some way to social or political issues;
(3) Data are available regarding their circulation by market.

The second criterion led to the exclusion of such national publications as *Popular Mechanics and Modern*

Bride. In the absence of circulation data by county or market (the third criterion), the number of relevant magazines and nationally distributed newspapers is understated in nearly every market.

The following important "issue" magazines and newspapers were not included due to the unavailability of reliable circulation data on a market basis:

Atlantic Monthly	Nation
Consumer Report	National Review
Consumers Union	New Republic
Dissent	Ramparts
Commerce Daily	Christian Science Monitor
Wall Street Journal	National Observer

Accompanying this introduction is a list of the magazines that were included as well as those magazines for which data were available but because of their subject matter were excluded. Despite the relatively small number of magazines included in this study, they entailed the processing of nearly 150,000 records (50 magazines circulating in over 3,000 counties).

Sources

The data regarding the number and circulation of media were drawn from a wide range of sources, all of them private, as listed below:

Media	Source
Television	ARB 1969 Coverage Study/TV Factbook, 1970
Radio	Pulse, Inc., 1967/Broadcasting Yearbook, 1970
Dailies	Sinding Yearbook, 1969/Editors & Publishers Yearbook 1970

Weeklies	National Director of Weekly Newspapers, 1970
Magazines	ABC Circulation, Inc. 1970

Where publications are concerned, the sources listed above generally supplemented the circulation data of the Audit Bureau of Circulation when the latter did not provide the figures. In the case of weeklies, the source also identified the publishers or owners. In all instances, it was possible to determine the market of origin of each publication. Magazines, however, are not identified as originating in a specific market. Their national orientation rendered this fact irrelevant.

In the case of radio stations, the 1967 survey by Pulse, Inc. offered the most recent and reliable circulation data available. Stations that went on-the-air since the survey were also included in this study, but without circulation figures (UNK).

Defining the Market

There are a number of definitions of a "market." Among the most common is the Standard Metropolitan Statistical Area (SMSA), defined by the U.S. Bureau of the Budget. This is a grouping of contiguous counties surrounding a city. They represent a market based on population criteria. There is a fairly long time lag in the adjustment of the SMSA definition of a market and it is not always an accurate reflection of the economics of the market place.

The city itself is sometimes employed to define the "market," but it is a political rather than an economic concept.

More recently, the American Research Bureau (ARB) developed the ADI concept (Area of Dominant Influence).

This is a communications oriented concept in which every one of the 3,100 counties in the nation is assigned to some market. The market to which a county is assigned is based on the location of the television stations that command the majority of the viewing hours reported for that county.

The broad geographic coverage of television signals is the most valid basis for identifying integrated geographic and economic units. It defines a market from the standpoint of the advertiser. This is generally true in the case of the newspaper as well as television. Thus, Sinding's Newspaper Directory includes a listing of newspapers by ADI. Within this geographic coverage area are numerous sub-markets even within the inner city, each with their own radio stations, dailies and weeklies.

Commuter mobility which has led to the development of suburban satellite communities around the urban core has also led to the decentralization of retail sales facilities through widely scattered shopping centers. Consequently, the communications media have become the binding force in today's retail markets The ADI concept was therefore employed in the present study as the definition of a market. With the exclusion of Hawaii and Alaska, there are 204 markets in this study, encompassing all the counties, homes, commercial media, and media owners within the continental United States.

An adjustment in the ARB definition of some of the markets was required in order for television data to conform to the circulation data available in the case of other types of media. As an example, the western half of Kern county constitutes the Bakersfield, California market as defined by ARB. In this study the television media and television audiences in the eastern half of Kern county were shifted away from Los Angeles and

added to Bakersfield. This type of adjustment was necessary in a number of markets. In addition to the number of media and media owners assigned to a market, this adjustment also effected the number of households credited to the market and consequently the market's national rank in terms of its size.

Ownership

Ownership and its relationship to control over media is an evasive concept. Each month the Federal Communications Commission, for its own use, prints a four volume computer listing of the name of every person owning over 1% of a radio or television station. This pile of paper stands 6 inches high, but tells us nothing that would be of assistance in analyzing the issues underlying the present concern of the Commission.

To avoid sinking into a similar morass of detail, the media in this study were generally grouped by corporate owner rather than by the name of the stockholders. Thus this study identified and collated media properties in each market that are connected by a common thread of ownership. This was done for those "outside" media that penetrate the market as well as for the media that originate locally. The result is a detailed census that presents a factual and useful picture of the commercial communications universe.

Sources

The trade publications maintain the most comprehensive and up-to-date record of cross-ownership of media. These sources include the Broadcasting Yearbook (TV and radio), Editors and Publishers Yearbook (dailies), and the American Newspapers Representative Annual (weeklies).

This information was cross-referenced and brought up-to-date as of June 30, 1970. A number of Washington attorneys representing the larger media organizations were also contacted to clarify the more complex ownership relationships.

Application

Each county was assigned its complement of media, media owners, and the audience or circulation of each medium in that county. This county information was assembled by the computer to form the ADI markets as defined by ARB (1968/69 definitions) subject to the adjustments described earlier. The average audience reached at a moment in time by each communications property, was then divided into the total number of homes in the market to arrive at the relative proportion of the market reached by each property. These properties were then grouped by owner under a four digit owner code assigned to each media property. In the directory volumes, an asterisk identifies those properties that originate within the market.

In the case of television circulation figures, the only source available by county is the ARB 1969 Coverage Study. These data consist of the total number of homes in the county and the percentage of hours of viewing they directed at each television station. These percentages were applied to the number of homes in the county in order to derive an absolute figure that could be cumulated for the market. The television circulation data that resulted more closely resemble a market share than the net weekly or net daily circulation.

These audience data provide a snapshot view of the number of homes reached by each medium at a moment in time. The purpose of this approach is to provide a

rough measure of their relative scale. In fact, however, each medium ultimately reaches many times the number of homes indicated in this study. It is safe to say that the network affiliated television stations originating in a market are received in nearly every household that has a television set in their market at least once in the course of a week. By the same token, media originating outside the market also reach more homes in the market in the course of the week than that indicated in this study. This is true of radio, newspapers and magazines, as well as television eminating from outside a market.

A circulation cut-off in which media obtaining less than 100 homes were dropped from a market was applied to all types of media. This resulted in a more conservative estimate of the number of media available in each market. Other decisions that resulted in a conservative estimate of available media was the use of weekday rather than Sunday circulation figures for newspapers. The higher Sunday circulation figures were sometimes sufficient to have increased the number of media in the +5% column in the summary or matrix volume, as discussed below. Perhaps most important, AM/FM combinations were counted as a single entry regardless of the degree to which their programming was independent.

In addition to the number of media and media owners originating in each market, the statistical summaries in Volume One present a tabulation of the number of media and owners that originate *outside* of the market but which are received in the market, and of these there is a column that shows the number that reach 5% or more of the homes in that market at any given moment.

The media and media owners entering a market from outside represent to the economist an approximation of the competition overhanging that market. Such media

can, if the expense is warranted, expand their circulation or audience in that market. This is of particular significance in the case of radio and television which are regulated and for which free entry, even of a limited nature, is generally not assumed.

Illustration of Results

In the heading of the illustration shown below, which is the format used throughout Volume I, is the market's rank, name, and size in terms of the number of homes located in that market. Thus Tyler, Texas ranks as market 177 based on its count of 45,000 homes. The first line in the Table itself is a summary count of the number of different media available to the public in this market, and the second line is the number of owners of these media. This is followed by a breakdown of the number of media available in the market.

The columns, proceeding from left to right, provide a breakdown of the totals, distinguishing between media that originate within this market and those that enter the market but originate elsewhere. The latter, those originating elsewhere, are further broken down to indicate the number of "outsiders" that obtain a local audience equal to 5% or more of the homes in the market.

Thus, the accompanying illustration shows that in Tyler, Texas, the public uses 84 different media that are owned by 68 different owner organizations (not counting the individual stockholders in each "organization"). Of this number, 22 of the media originate within this market, and they are owned by 19 owner organizations (*i.e.*, a few owners own more than one medium originating in this market).

Similarly, 62 different media are received by Tyler's citizens from outside their market, and these media are

owned by 49 different owner organizations. An owner, once counted as indigenous to the market, is not counted again if he also owns a medium entering from outside the market. Of the 49 owners "entering from outside" 13 each have access to 5% or more of the audience in the Tyler market. The number of different types of media involved are indicated under each of the relevant captions discussed above.

MARKET 177 TYLER, TEXAS HOMES: 45,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	84	22	62	19
OWNERS	68	19	49	13
TV STATIONS	9	1	8	3
RADIO STATIONS	23	9	14	1
DAILY NEWSPAPERS	8	2	6	1
WEEKLY NEWSPAPERS	10	10	0	0
MAGAZINES	34	—	34	14

Differences With FCC Data

The present illustration provides an opportunity to focus on differences between the FCC's figures and those resulting from the present study. Thus, the FCC reports that there are only 4 radio stations and only 1 television station assigned to the Tyler market. Our findings indicate that in fact, 23 radio stations and 9 television

stations are available off-the-air in the Tyler market. Of the latter, 1 television station and 9 radio stations originate in Tyler, and 14 radio and 8 television signals reach into Tyler from outside the market. Nor does the present study include the three TV signals from Houston, Texas that ARB reports as reaching the Tyler market but which we estimate obtain fewer than 100 viewing homes and were therefore dropped from our estimates for Tyler (see earlier discussion of cut-off criterion).

The principal reason for these differences with FCC figures is their use of the SMSA or "community of assignment" as their basis for organizing data, while the present study employed the ADI concept, discussed earlier.

Differences With Standard Industry Sources

Four factors built into the present analysis explain the differences in the size and ranking of some of the 204 markets when compared to other published sources. These include:

(1) The use of 1968/69 ADI definitions instead of 1969/70;

(2) The use of total homes instead of TV homes as the determinant of rank;

(3) The exclusion of Alaska and Hawaii from the present study;

(4) The joining of counties split between two markets and the assignment of ARB's non-ADI communities to an ADI market for the purposes of this analysis.

To illustrate, we use the Sacramento-Stockton, California market, which was the market most effected by these criteria. It is assigned an ADI rank of 25, and its number

of TV homes is 532,400 in the most recent ARB Television Market Analysis. In our study it ranks as the 29th market with 490,200 homes (not *TV* homes). This difference is explained in part by the use of ARB's 1969 market definition which consisted of 18 counties, whereas in 1969/70 ARB added 3 counties to the Sacramento market, a difference of about 4,000 homes. For purposes of this study two split counties were also shifted from Sacramento to San Francisco. The split counties are Contra Costa East (46,600), and Solano East (22,300). By employing the earlier definition and removing the split counties, this market is accorded a lower size and rank than given it by ARB (and the converse for San Francisco).

Another result of the criteria used in the organization of this market is the lower count of television stations received in the market, and the converse for San Francisco.

The 1968/69 definitions were used in the present study because some of the data were already available on the basis of the earlier market definitions. As an overall proposition, a reworking of the available data was not warranted.

In its Television Market Analysis (1969) ARB also lists 21 towns and cities not assigned an ADI designation but which its 1969 Coverage Study indicates are markets in themselves. These include the following:

1969/70

Non-ADI Markets	Home County TV Households
Worcester	180,600
Ft. Lauderdale	174,600
Akron	168,200
Palm Springs	137,000
Canton	108,500
Manchester	63,900
Modesto	54,800
Jamestown	48,900
Muskegon	47,600
Muncie	36,400
Tuscaloosa	31,500
Anderson	30,600
Parkersburg	28,300
Hickory	25,200
Marion	23,900
Fond Du Lac	22,200
Fayetville	21,500
Wildwood	18,500
Ft. Pierce	15,700
Bowling Green	15,100
Ft. Dodge	15,100
Jacksonville, Ill.	10,100

Since more than just the television media were involved in this study, these non-ADI markets are assigned to their nearest ADI. As a consequence, the markets to which these 21 communities are assigned may differ from the standard ARB market definition of size and rank. The foregoing list includes six communities not

so listed in 1968/69 and excludes four other communities that were treated as non-ADI markets in 1968/69.

These adjustments represent a relatively minor element in the overall plan of this study, but since they explain differences between the size and ranking of markets that will emerge with the use of other source material for further research, it is best that they be noted. An example of a radical change is the Lufkin, Texas market which consisted of three counties in 1968/69 but which was not included in the 1969/70 to surrounding ADI's. This instability in the definition of smaller television markets results from relatively minor shifts in TV viewing patterns that do not necessarily effect the other media.

Treatment of Television Satellite Stations

Another point worth noting in the computer program relates to television satellites. There are presently 42 "parent" stations which operate 55 satellite stations inside the continental United States. A satellite station generally has the same ownership as its parent and generally carries most of the same programming; however, it is generally a distinct operation in the physical sense of facilities and call letters.

Although 12 satellites operate across state lines from their parent stations, all except eight originate within the same ADI market as the parent station. The usual practice for ARB is to attribute all viewing of the parent and its satellites to the parent station if the satellite is in the same market. In the present study, a parent and its satellite(s) are treated as separate units, under joint ownership. This treatment of satellites is analogous to our treatment of newspapers where the morning and evening dailies published by the same owner under different mast-heads are treated as separate properties.

MAGAZINES INCLUDED IN MEDIA ANALYSIS

Publication	National Circulation
Business Week	555,498
Capper's Weekly	471,647
Catholic Digest	500,814
Cosmopolitan	1,023,707
Ebony	1,188,201
Esquire	1,027,254
Family Circle	7,053,606
Family Weekly	7,500,000
Field & Stream	1,591,044
First 3 Markets	5,100,000
Forbes	590,556
Fortune	504,435
Good Housekeeping	5,519,658
Grit	1,406,831
Ladies Home Journal	6,727,150
Life	8,586,565
Look Magazine	7,791,538
McCalls	8,334,553
Nation's Business	873,513
The New Yorker	418,890
Newsweek	2,616,229
Outdoor Life	1,609,370
Parent's Magazine	2,028,381
Playboy	4,473,249
Presbyterian Life	838,711

Publication	National Circulation
Reader's Digest	17,368,972
Redbook	4,538,779
Saturday Review	594,034
Southern Living	648,562
Sunset Magazine	985,289
Time	4,298,799
TV Guide	15,165,081
U.S. News & World Report	1,862,370
Woman's Day	7,761,605
Amer. Agr. & Rural NY	183,480
Colorado Rancher	45,480
Farm Journal	2,818,754
The Farmer	217,090
The Farmer-Stockman	398,953
Kansas Farmer	111,959
Michigan Farmer	97,990
Missouri Ruralist	136,827
Nebraska Farmer	95,447
The Ohio Farmer	107,399
Parade	16,250,000
Pennsylvania Farmer	99,519
Prairie Farmer	349,276
Progressive Farmer	1,183,559
Wallaces Farmer	206,228
Wisc. Agriculturist	123,655

MAGAZINES REJECTED THROUGH DATA AVAILABLE

Publication	National Circulation
Air Progress	101,415
American Home	3,505,863
Argosy	1,288,116
Better Homes & Gardens	7,740,238
Modern Bride	312,486
The Family Handyman	520,042
Glamour	1,414,063
Golf	400,323
Harpers Bazaar	457,724
Holiday	1,073,235
House Beautiful	930,038
House & Garden	1,216,288
Mademoiselle	648,240
Mechanix Illustrated	1,460,050
National Geographic	5,791,803
Popular Mechanics	1,792,696
Popular Science	1,558,450
Ski	265,646
Sports Afield	1,344,545
Sports Illustrated	1,989,346
Town and Country	110,690
Vogue	430,280

MARKET 001 NEW YORK,NEW YORK — HOMES: 6,041,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA				
OWNERS	610	519	91	15
	434	372	62	12
TV STATIONS	26	8	18	0
RADIO STATIONS	104	89	15	0
DAILY NEWSPAPERS	72	49	23	0
WEEKLY NEWSPAPERS	373	373	0	0
MAGAZINES	35	-	35	15

MARKET 002 LOS ANGELES,CALIFORNIA — HOMES: 3,452,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA				
OWNERS	419	362	58	15
	290	248	42	12
TV STATIONS	24	13	11	0
RADIO STATIONS	98	92	6	0
DAILY NEWSPAPERS	54	48	6	0
WEEKLY NEWSPAPERS	208	208	0	0
MAGAZINES	35	-	35	15

MARKET 003 CHICAGO, ILLINOIS HOMES: 2,580,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	482	402	80	14
OWNERS	279	224	55	12
TV STATIONS	28	9	19	0
RADIO STATIONS	88	78	10	0
DAILY NEWSPAPERS	54	40	14	0
WEEKLY NEWSPAPERS	275	275	0	0
MAGAZINES	37	-	37	14

MARKET 004 PHILADELPHIA, PENNSYLVANIA HOMES: 2,168,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	347	256	91	15
OWNERS	260	199	61	12
TV STATIONS	25	7	18	0
RADIO STATIONS	101	82	19	0
DAILY NEWSPAPERS	53	36	17	0
WEEKLY NEWSPAPERS	131	131	0	0
MAGAZINES	37	-	37	15

MARKET 005 SAN FRANCISCO, CALIFORNIA HOMES: 1,591,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	241	184	57	18
OWNERS	196	148	48	15
TV STATIONS	19	9	10	0
RADIO STATIONS	66	59	7	2
DAILY NEWSPAPERS	38	32	6	0
WEEKLY NEWSPAPERS	84	84	0	0
MAGAZINES	34	-	34	16

MARKET 006 BOSTON, MASSACHUSETTS HOMES: 1,508,500

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	336	257	79	15
OWNERS	247	190	57	12
TV STATIONS	24	8	16	0
RADIO STATIONS	85	68	17	0
DAILY NEWSPAPERS	53	41	12	0
WEEKLY NEWSPAPERS	140	140	0	0
MAGAZINES	34	-	34	15

MARKET 007 DETROIT,MICHIGAN HOMES: 1,423,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	233	171	62	13
OWNERS	167	118	49	11
TV STATIONS	13	6	7	0
RADIO STATIONS	55	43	12	0
DAILY NEWSPAPERS	20	11	9	0
WEEKLY NEWSPAPERS	111	111	0	0
MAGAZINES	34	-	34	13

MARKET 008 CLEVELAND,OHIO HOMES: 1,291,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	225	142	83	14
OWNERS	164	103	61	11
TV STATIONS	23	7	16	0
RADIO STATIONS	68	47	21	0
DAILY NEWSPAPERS,	37	26	11	0
WEEKLY NEWSPAPERS	62	62	0	0
MAGAZINES	35	-	35	14

MARKET 009 WASHINGTON,DC HOMES: 1,055,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	241	150	91	15
OWNERS	179	118	61	13
TV STATIONS	22	6	16	0
RADIO STATIONS	91	65	26	0
DAILY NEWSPAPERS	31	19	12	0
WEEKLY NEWSPAPERS	60	60	0	0
MAGAZINES	37	-	37	15

MARKET 010 PITTSBURGH,PENNSYLVANIA HOMES: 1,004,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	242	137	105	12
OWNERS	182	109	73	10
TV STATIONS	21	4	17	0
RADIO STATIONS	74	39	35	0
DAILY NEWSPAPERS	50	34	16	0
WEEKLY NEWSPAPERS	60	60	0	0
MAGAZINES	37	-	37	12

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MARKET 011 ST. LOUIS,MISSOURI HOMES: 891,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	260	182	78	14
OWNERS	219	159	60	11
TV STATIONS	16	5	11	0
RADIO STATIONS	59	42	17	0
DAILY NEWSPAPERS	27	14	13	0
WEEKLY NEWSPAPERS	121	121	0	0
MAGAZINES	37	-	37	14

MARKET 012 DALLAS-FT. WORTH,TEXAS HOMES: 863,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	259	187	72	18
OWNERS	214	158	56	15
TV STATIONS	16	7	9	0
RADIO STATIONS	66	49	17	1
DAILY NEWSPAPERS	40	31	9	0
WEEKLY NEWSPAPERS	100	100	0	0
MAGAZINES	37	-	37	17

MARKET 013 MINNEAPOLIS-ST PAUL,MINNESOTA HOMES: 747,500

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	306	219	87	16
OWNERS	251	187	64	14
TV STATIONS	15	4	11	0
RADIO STATIONS	72	43	29	1
DAILY NEWSPAPERS	23	10	13	0
WEEKLY NEWSPAPERS	162	162	0	0
MAGAZINES	34	-	34	15

MARKET 014 HOUSTON,TEXAS HOMES: 696,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	176	98	78	12
OWNERS	147	81	66	10
TV STATIONS	14	4	10	0
RADIO STATIONS	62	37	25	0
DAILY NEWSPAPERS	15	9	6	0
WEEKLY NEWSPAPERS	48	48	0	0
MAGAZINES	37	-	37	12

MARKET 015 INDIANAPOLIS, INDIANA HOMES: 685,100

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	252	152	100	18
OWNERS	195	124	71	15
TV STATIONS	27	7	20	0
RADIO STATIONS	81	47	34	2
DAILY NEWSPAPERS	47	35	12	1
WEEKLY NEWSPAPERS	63	63	0	0
MAGAZINES	34	-	34	15

MARKET 016 BALTIMORE, MARYLAND HOMES: 672,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	150	73	77	14
OWNERS	118	62	56	12
TV STATIONS	17	4	13	1
RADIO STATIONS	44	29	15	0
DAILY NEWSPAPERS	18	4	14	0
WEEKLY NEWSPAPERS	36	36	0	0
MAGAZINES	35	-	35	13

MARKET 017 SEATTLE-TACOMA, WASHINGTON HOMES: 671,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	206	146	60	15
OWNERS	164	118	46	13
TV STATIONS	10	5	5	0
RADIO STATIONS	64	50	14	0
DAILY NEWSPAPERS	17	11	6	0
WEEKLY NEWSPAPERS	80	80	0	0
MAGAZINES	35	-	35	15

MARKET 018 ATLANTA, GEORGIA HOMES: 671,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	243	155	88	13
OWNERS	201	131	70	11
TV STATIONS	17	5	12	0
RADIO STATIONS	104	71	33	0
DAILY NEWSPAPERS	18	10	8	0
WEEKLY NEWSPAPERS	69	69	0	0
MAGAZINES	35	-	35	13

MARKET 019 MIAMI, FLORIDA — HOMES: 618,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	113	62	51	14
OWNERS	100	60	40	12
TV STATIONS	11	6	5	0
RADIO STATIONS	40	35	5	1
DAILY NEWSPAPERS	16	9	7	0
WEEKLY NEWSPAPERS	12	12	0	0
MAGAZINES	34	-	34	13

MARKET 020 CINCINNATI, OHIO — HOMES: 599,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	190	100	90	13
OWNERS	153	84	69	11
TV STATIONS	22	4	18	0
RADIO STATIONS	62	28	34	1
DAILY NEWSPAPERS	10	7	3	0
WEEKLY NEWSPAPERS	61	61	0	0
MAGAZINES	35	-	35	12

MARKET 021 HARTFORD-NEW HAVEN, CONNECTICUT — HOMES: 584,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	146	79	67	18
OWNERS	121	71	50	15
TV STATIONS	20	5	15	2
RADIO STATIONS	35	28	7	0
DAILY NEWSPAPERS	28	16	12	1
WEEKLY NEWSPAPERS	30	30	0	0
MAGAZINES	33	-	33	15

MARKET 022 BUFFALO, NEW YORK — HOMES: 579,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	175	102	73	14
OWNERS	129	80	49	11
TV STATIONS	17	3	14	0
RADIO STATIONS	46	32	14	0
DAILY NEWSPAPERS	24	14	10	0
WEEKLY NEWSPAPERS	53	53	0	0
MAGAZINES	35	-	35	14

MARKET 023 MILWAUKEE,WISCONSIN HOMES: 565,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	166	97	69	15
OWNERS	130	79	51	12
TV STATIONS	15	4	11	0
RADIO STATIONS	44	28	16	2
DAILY NEWSPAPERS	15	8	7	0
WEEKLY NEWSPAPERS	57	57	0	0
MAGAZINES	35	-	35	13

MARKET 024 MEMPHIS,TENNESSEE HOMES: 552,900

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	234	144	90	11
OWNERS	194	126	68	9
TV STATIONS	16	4	12	0
RADIO STATIONS	86	57	29	0
DAILY NEWSPAPERS	24	12	12	0
WEEKLY NEWSPAPERS	71	71	0	0
MAGAZINES	37	-	37	11

MARKET 025 KANSAS CITY,MISSOURI HOMES: 543,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	201	124	77	14
OWNERS	167	105	62	12
TV STATIONS	11	4	7	0
RADIO STATIONS	45	23	22	0
DAILY NEWSPAPERS	28	18	10	0
WEEKLY NEWSPAPERS	79	79	0	0
MAGAZINES	38	-	38	14

MARKET 026 PORTLAND,OREGON HOMES: 535,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	204	134	70	17
OWNERS	171	117	54	14
TV STATIONS	17	5	12	0
RADIO STATIONS	67	53	14	1
DAILY NEWSPAPERS	21	12	9	0
WEEKLY NEWSPAPERS	64	64	0	0
MAGAZINES	35	-	35	16

MARKET 027 TAMPA-ST PETERSBURG,FLORIDA HOMES: 534,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	161	102	59	13
OWNERS	141	94	47	10
TV STATIONS	9	5	4	0
RADIO STATIONS	62	50	12	0
DAILY NEWSPAPERS	19	11	8	0
WEEKLY NEWSPAPERS	36	36	0	0
MAGAZINES	35	-	35	13

MARKET 028 NASHVILLE,TENNESSEE HOMES: 505,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	273	157	116	13
OWNERS	224	141	83	11
TV STATIONS	26	5	21	0
RADIO STATIONS	115	72	43	0
DAILY NEWSPAPERS	28	11	17	0
WEEKLY NEWSPAPERS	69	69	0	0
MAGAZINES	35	-	35	13

MARKET 029 SACRAMENTO-STOCKTON,CALIFORNIA HOMES: 490,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	182	109	73	17
OWNERS	147	88	59	14
TV STATIONS	20	5	15	0
RADIO STATIONS	57	40	17	1
DAILY NEWSPAPERS	20	14	6	1
WEEKLY NEWSPAPERS	50	50	0	0
MAGAZINES	35	-	35	15

MARKET 030 PROVIDENCE,RHODE ISLAND HOMES: 486,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	134	63	71	20
OWNERS	108	56	52	16
TV STATIONS	13	3	10	3
RADIO STATIONS	43	27	16	2
DAILY NEWSPAPERS	25	14	11	1
WEEKLY NEWSPAPERS	19	19	0	0
MAGAZINES	34	-	34	14

MARKET 031 CHARLESTON-HUNTINGTON,WEST VIRGINIA HOMES: 466,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	231	134	97	13
OWNERS	186	112	74	11
TV STATIONS	22	5	17	0
RADIO STATIONS	88	55	33	0
DAILY NEWSPAPERS	28	18	10	0
WEEKLY NEWSPAPERS	56	56	0	0
MAGAZINES	37	-	37	13

MARKET 032 DENVER,COLORADO HOMES: 461,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	170	112	58	16
OWNERS	146	98	48	14
TV STATIONS	10	4	6	0
RADIO STATIONS	49	40	9	2
DAILY NEWSPAPERS	20	12	8	0
WEEKLY NEWSPAPERS	56	56	0	0
MAGAZINES	35	-	35	14

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MARKET 033 BIRMINGHAM,ALABAMA HOMES: 458,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	186	101	85	15
OWNERS	159	93	66	13
TV STATIONS	23	5	18	0
RADIO STATIONS	77	53	24	2
DAILY NEWSPAPERS	17	9	8	0
WEEKLY NEWSPAPERS	34	34	0	0
MAGAZINES	35	-	35	13

MARKET 034 NEW ORLEANS,LOUISIANA HOMES: 440,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	123	62	61	10
OWNERS	108	58	50	9
TV STATIONS	10	4	6	0
RADIO STATIONS	45	32	13	0
DAILY NEWSPAPERS	11	4	7	0
WEEKLY NEWSPAPERS	22	22	0	0
MAGAZINES	35	-	35	10

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MARKET 035 CHARLOTTE,NORTH CAROLINA HOMES: 434,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	197	109	88	14
OWNERS	159	93	66	12
TV STATIONS	21	5	16	0
RADIO STATIONS	88	60	28	0
DAILY NEWSPAPERS	22	13	9	0
WEEKLY NEWSPAPERS	31	31	0	0
MAGAZINES	35	-	35	14

MARKET 036 COLUMBUS,OHIO HOMES: 433,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	192	85	107	15
OWNERS	147	71	76	13
TV STATIONS	19	3	16	0
RADIO STATIONS	63	22	41	1
DAILY NEWSPAPERS	32	17	15	0
WEEKLY NEWSPAPERS	43	43	0	0
MAGAZINES	35	-	35	14

MARKET 037 GRAND RAPIDS/KALAMAZOO,MICHIGAN HOMES: 414,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	201	115	86	20
OWNERS	162	99	63	17
TV STATIONS	21	4	17	0
RADIO STATIONS	65	41	24	1
DAILY NEWSPAPERS	25	14	11	1
WEEKLY NEWSPAPERS	56	56	0	0
MAGAZINES	34	-	34	18

MARKET 038 ALBANY-SCHENECTADY-TROY,NEW YORK HOMES: 413,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	153	79	74	16
OWNERS	118	61	57	12
TV STATIONS	22	4	18	0
RADIO STATIONS	38	25	13	0
DAILY NEWSPAPERS	26	17	9	1
WEEKLY NEWSPAPERS	33	33	0	0
MAGAZINES	34	-	34	15

MARKET 039 SAN DIEGO,CALIFORNIA HOMES: 412,500

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	98	48	50	19
OWNERS	82	41	41	16
TV STATIONS	13	5	8	0
RADIO STATIONS	20	17	3	3
DAILY NEWSPAPERS	9	5	4	0
WEEKLY NEWSPAPERS	21	21	0	0
MAGAZINES	35	-	35	16

MARKET 040 LOUISVILLE,KENTUCKY HOMES: 402,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	172	88	84	12
OWNERS	145	79	66	10
TV STATIONS	20	3	17	0
RADIO STATIONS	61	33	28	0
DAILY NEWSPAPERS	12	8	4	0
WEEKLY NEWSPAPERS	44	44	0	0
MAGAZINES	35	-	35	12

MARKET 041 GREENVILLE SPARTANBURG ASHEVILLE NC HOMES: 398,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	215	118	97	15
OWNERS	172	97	75	13
TV STATIONS	20	5	15	0
RADIO STATIONS	93	57	36	1
DAILY NEWSPAPERS	23	12	11	0
WEEKLY NEWSPAPERS	44	44	0	0
MAGAZINES	35	-	35	14

MARKET 042 OKLAHOMA CITY,OKLAHOMA HOMES: 392,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	254	165	89	17
OWNERS	199	131	68	16
TV STATIONS	17	3	14	0
RADIO STATIONS	59	29	30	2
DAILY NEWSPAPERS	32	24	8	0
WEEKLY NEWSPAPERS	109	109	0	0
MAGAZINES	37	-	37	15

MARKET 043 SYRACUSE,NEW YORK HOMES: 383,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	193	114	79	21
OWNERS	137	79	58	17
TV STATIONS	19	4	15	1
RADIO STATIONS	56	38	18	2
DAILY NEWSPAPERS	22	10	12	0
WEEKLY NEWSPAPERS	62	62	0	0
MAGAZINES	34	-	34	18

MARKET 044 DAYTON,OHIO HOMES: 376,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	152	61	92	17
OWNERS	121	52	69	15
TV STATIONS	21	5	16	0
RADIO STATIONS	43	12	31	3
DAILY NEWSPAPERS	25	16	9	0
WEEKLY NEWSPAPERS	27	27	0	0
MAGAZINES	36	-	36	14

MARKET 045 PHOENIX,ARIZONA HOMES: 371,500

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	161	99	62	14
OWNERS	134	82	52	12
TV STATIONS	14	5	9	0
RADIO STATIONS	55	45	10	1
DAILY NEWSPAPERS	14	6	8	0
WEEKLY NEWSPAPERS	43	43	0	0
MAGAZINES	35	-	35	13

MARKET 046 NORFOLK-PORTSMOUTH-NEWPORT-NEWS-HAMPTON,VAHOMES: 368,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	108	45	63	8
OWNERS	85	34	51	8
TV STATIONS	12	4	8	0
RADIO STATIONS	35	23	12	0
DAILY NEWSPAPERS	14	6	8	0
WEEKLY NEWSPAPERS	12	12	0	0
MAGAZINES	35	-	35	8

MARKET 047 SAN ANTONIO,TEXAS HOMES: 364,100

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	176	103	73	15
OWNERS	143	89	54	13
TV STATIONS	17	5	12	0
RADIO STATIONS	55	38	17	0
DAILY NEWSPAPERS	15	8	7	0
WEEKLY NEWSPAPERS	52	52	0	0
MAGAZINES	37	-	37	15

MARKET 048 HARRISBURG YORK LANCASTER LEBANON,PA HOMES: 351,100

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	135	63	72	19
OWNERS	102	51	51	16
TV STATIONS	21	5	16	0
RADIO STATIONS	33	23	10	0
DAILY NEWSPAPERS	22	11	11	0
WEEKLY NEWSPAPERS	24	24	0	0
MAGAZINES	35	-	35	19

MARKET 049 SALT LAKE CITY,UTAH HOMES: 340,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	196	118	78	14
OWNERS	161	97	64	11
TV STATIONS	16	3	13	0
RADIO STATIONS	62	42	20	0
DAILY NEWSPAPERS	18	9	9	0
WEEKLY NEWSPAPERS	64	64	0	0
MAGAZINES	36	-	36	14

MARKET 050 ORLANDO-DAYTONA BEACH,FLORIDA HOMES: 336,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	141	77	64	14
OWNERS	119	70	49	11
TV STATIONS	10	3	7	0
RADIO STATIONS	56	42	14	0
DAILY NEWSPAPERS	20	12	8	0
WEEKLY NEWSPAPERS	20	20	0	0
MAGAZINES	35	-	35	14

MARKET 051 TULSA OKLAHOMA HOMES: 333,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	206	114	92	13
OWNERS	159	94	65	11
TV STATIONS	16	4	12	0
RADIO STATIONS	60	32	28	0
DAILY NEWSPAPERS	32	18	14	0
WEEKLY NEWSPAPERS	60	60	0	0
MAGAZINES	38	-	38	13

MARKET 052 FLINT-SAGINAW-BAY CITY, MICHIGAN HOMES: 333,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	141	76	65	19
OWNERS	118	69	49	17
TV STATIONS	15	3	12	2
RADIO STATIONS	36	24	12	1
DAILY NEWSPAPERS	14	7	7	1
WEEKLY NEWSPAPERS	42	42	0	0
MAGAZINES	34	-	34	15

MARKET 053 GREENSBORO-WINSTON/SALEM, NORTH CAROLINA HOMES: 331,100

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	160	79	81	13
OWNERS	133	71	62	11
TV STATIONS	15	4	11	0
RADIO STATIONS	63	39	24	0
DAILY NEWSPAPERS	21	10	11	0
WEEKLY NEWSPAPERS	26	26	0	0
MAGAZINES	35	-	35	13

MARKET 054 WICHITA, KANSAS HOMES: 322,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	267	176	91	20
OWNERS	222	155	67	18
TV STATIONS	24	7	17	0
RADIO STATIONS	63	38	25	1
DAILY NEWSPAPERS	34	21	13	1
WEEKLY NEWSPAPERS	110	110	0	0
MAGAZINES	36	-	36	18

MARKET 055 SHREVEPORT-LA-TEXARKANA,TEXAS HOMES: 321,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	204	116	88	13
OWNERS	165	101	64	11
TV STATIONS	15	3	12	0
RADIO STATIONS	72	45	27	0
DAILY NEWSPAPERS	27	14	13	0
WEEKLY NEWSPAPERS	54	54	0	0
MAGAZINES	36	-	36	13

MARKET 056 LITTLE ROCK,ARKANSAS HOMES: 316,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	203	118	85	14
OWNERS	163	102	61	12
TV STATIONS	14	3	11	0
RADIO STATIONS	79	46	33	0
DAILY NEWSPAPERS	20	15	5	0
WEEKLY NEWSPAPERS	54	54	0	0
MAGAZINES	36	-	36	14

MARKET 057 RICHMOND,VIRGINIA HOMES: 308,500

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	154	68	86	16
OWNERS	128	63	65	12
TV STATIONS	15	3	12	0
RADIO STATIONS	64	33	31	1
DAILY NEWSPAPERS	13	5	8	0
WEEKLY NEWSPAPERS	27	27	0	0
MAGAZINES	35	-	35	15

MARKET 058 WILKES-BARRE-SCRANTON,PENNSYLVANIA HOMES: 298,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	131	62	69	15
OWNERS	112	58	54	12
TV STATIONS	23	3	20	0
RADIO STATIONS	33	28	5	0
DAILY NEWSPAPERS	24	15	9	0
WEEKLY NEWSPAPERS	16	16	0	0
MAGAZINES	35	-	35	15

MARKET 059 TOLEDO,OHIO — HOMES: 297,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	160	75	85	18
OWNERS	124	61	63	16
TV STATIONS	20	3	17	0
RADIO STATIONS	36	17	19	3
DAILY NEWSPAPERS	26	12	14	1
WEEKLY NEWSPAPERS	43	43	0	0
MAGAZINES	35	-	35	14

MARKET 060 JACKSONVILLE,FLORIDA — HOMES: 292,100

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	138	65	73	13
OWNERS	122	63	59	11
TV STATIONS	13	3	10	0
RADIO STATIONS	51	32	19	1
DAILY NEWSPAPERS	17	8	9	0
WEEKLY NEWSPAPERS	22	22	0	0
MAGAZINES	35	-	35	12

MARKET 061 KNOXVILLE,TENNESSEE — HOMES: 289,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	183	70	113	13
OWNERS	155	63	92	12
TV STATIONS	18	3	15	0
RADIO STATIONS	77	23	54	0
DAILY NEWSPAPERS	19	10	9	0
WEEKLY NEWSPAPERS	34	34	0	0
MAGAZINES	35	-	35	13

MARKET 062 MOBILE ALA.-PENSACOLA,FLORIDA — HOMES: 278,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	142	59	83	15
OWNERS	123	56	67	13
TV STATIONS	12	3	9	0
RADIO STATIONS	58	28	30	1
DAILY NEWSPAPERS	16	6	10	0
WEEKLY NEWSPAPERS	22	22	0	0
MAGAZINES	34	-	34	14

MARKET 063 ROANOKE-LYNCHBURG, VIRGINIA — HOMES: 271,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	181	83	98	17
OWNERS	150	72	78	15
TV STATIONS	19	4	15	0
RADIO STATIONS	72	37	35	3
DAILY NEWSPAPERS	25	12	13	0
WEEKLY NEWSPAPERS	30	30	0	0
MAGAZINES	35	-	35	14

MARKET 064 OMAHA, NEBRASKA — HOMES: 268,500

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	206	122	84	18
OWNERS	159	96	63	14
TV STATIONS	14	3	11	0
RADIO STATIONS	38	16	22	0
DAILY NEWSPAPERS	22	8	14	1
WEEKLY NEWSPAPERS	95	95	0	0
MAGAZINES	37	-	37	17

MARKET 065 DES MOINES, IOWA — HOMES: 267,500

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	229	147	82	15
OWNERS	179	119	60	13
TV STATIONS	16	4	12	0
RADIO STATIONS	54	27	27	0
DAILY NEWSPAPERS	21	13	8	0
WEEKLY NEWSPAPERS	103	103	0	0
MAGAZINES	35	-	35	15

MARKET 066 DAVENPORT, IOWA — HOMES: 266,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	198	103	95	21
OWNERS	157	90	67	17
TV STATIONS	20	3	17	0
RADIO STATIONS	50	19	31	4
DAILY NEWSPAPERS	23	12	11	1
WEEKLY NEWSPAPERS	69	69	0	0
MAGAZINES	36	-	36	16

MARKET 067 FRESNO-VISALIA, CALIFORNIA HOMES: 262,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	125	59	66	17
OWNERS	102	53	49	15
TV STATIONS	17	4	13	0
RADIO STATIONS	41	30	11	1
DAILY NEWSPAPERS	14	7	7	1
WEEKLY NEWSPAPERS	18	18	0	0
MAGAZINES	35	-	35	15

MARKET 068 RALEIGH-DURHAM, NORTH CAROLINA HOMES: 258,100

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	131	55	76	17
OWNERS	112	49	63	14
TV STATIONS	11	3	8	0
RADIO STATIONS	47	23	24	2
DAILY NEWSPAPERS	17	8	9	0
WEEKLY NEWSPAPERS	21	21	0	0
MAGAZINES	35	-	35	15

MARKET 069 CHAMPAIGN-DECATUR-SPRINGFIELD, ILLINOIS HOMES: 252,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	190	111	79	23
OWNERS	140	82	58	19
TV STATIONS	19	4	15	0
RADIO STATIONS	42	21	21	5
DAILY NEWSPAPERS	25	17	8	0
WEEKLY NEWSPAPERS	69	69	0	0
MAGAZINES	35	-	35	18

MARKET 070 ROCHESTER, NEW YORK HOMES: 252,500

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	103	50	53	13
OWNERS	74	31	43	11
TV STATIONS	12	3	9	0
RADIO STATIONS	17	13	4	0
DAILY NEWSPAPERS	11	4	7	0
WEEKLY NEWSPAPERS	30	30	0	0
MAGAZINES	33	-	33	13

MARKET 071 JACKSON, MISSISSIPPI HOMES: 242,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	175	85	90	11
OWNERS	138	72	66	10
TV STATIONS	16	2	14	1
RADIO STATIONS	73	39	34	2
DAILY NEWSPAPERS	15	6	9	0
WEEKLY NEWSPAPERS	38	38	0	0
MAGAZINES	33	-	33	8

MARKET 072 CEDAR RAPIDS-WATERLOO, IOWA HOMES: 242,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	199	112	87	20
OWNERS	157	94	63	16
TV STATIONS	18	3	15	0
RADIO STATIONS	39	16	23	2
DAILY NEWSPAPERS	21	8	13	1
WEEKLY NEWSPAPERS	85	85	0	0
MAGAZINES	36	-	36	17

MARKET 073 GREEN BAY, WISCONSIN HOMES: 238,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	148	80	68	21
OWNERS	113	68	45	16
TV STATIONS	14	5	9	0
RADIO STATIONS	44	27	17	2
DAILY NEWSPAPERS	16	10	6	2
WEEKLY NEWSPAPERS	38	38	0	0
MAGAZINES	36	-	36	17

MARKET 074 GREENVILLE-NEW BERN-WASH., NORTH CAROLINA HOMES: 235,500

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	142	68	74	19
OWNERS	117	60	57	17
TV STATIONS	12	3	9	2
RADIO STATIONS	56	37	19	2
DAILY NEWSPAPERS	21	10	11	1
WEEKLY NEWSPAPERS	18	18	0	0
MAGAZINES	35	-	35	14

MARKET 075 JOHNSTOWN-ALTOONA, PENNSYLVANIA HOMES: 233,500

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	163	79	84	22
OWNERS	125	63	62	17
TV STATIONS	21	3	18	2
RADIO STATIONS	47	33	14	1
DAILY NEWSPAPERS	32	15	17	1
WEEKLY NEWSPAPERS	28	28	0	0
MAGAZINES	35	-	35	18

MARKET 076 SPOKANE, WASHINGTON HOMES: 230,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	197	114	83	18
OWNERS	166	104	62	15
TV STATIONS	19	3	16	0
RADIO STATIONS	59	35	24	0
DAILY NEWSPAPERS	17	9	8	0
WEEKLY NEWSPAPERS	67	67	0	0
MAGAZINES	35	-	35	18

MARKET 077 CAPE GIRARDEAU, MISSOURI HOMES: 227,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	219	111	108	19
OWNERS	178	95	83	17
TV STATIONS	20	4	16	0
RADIO STATIONS	75	32	43	2
DAILY NEWSPAPERS	27	16	11	1
WEEKLY NEWSPAPERS	59	59	0	0
MAGAZINES	38	-	38	16

MARKET 078 PORTLAND-POLAND SPRING, MAINE HOMES: 221,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	141	70	71	16
OWNERS	113	60	53	14
TV STATIONS	11	3	8	0
RADIO STATIONS	45	26	19	1
DAILY NEWSPAPERS	20	10	10	0
WEEKLY NEWSPAPERS	31	31	0	0
MAGAZINES	34	-	34	15

MARKET 079 CHATTANOOGA,TENNESSEE HOMES: 214,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	147	57	90	18
OWNERS	124	53	71	16
TV STATIONS	16	3	13	0
RADIO STATIONS	54	22	32	5
DAILY NEWSPAPERS	16	6	10	0
WEEKLY NEWSPAPERS	26	26	0	0
MAGAZINES	35	-	35	13

MARKET 080 LINCOLN-HASTINGS-KEARNEY,NEBRASKA HOMES: 200,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	259	157	104	27
OWNERS	211	130	81	22
TV STATIONS	22	6	16	2
RADIO STATIONS	58	20	38	6
DAILY NEWSPAPERS	22	10	12	1
WEEKLY NEWSPAPERS	119	119	0	0
MAGAZINES	38	-	38	18

MARKET 081 ALBUQUERQUE,NEW MEXICO HOMES: 195,100

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	147	70	77	15
OWNERS	124	61	63	13
TV STATIONS	13	3	10	0
RADIO STATIONS	56	34	22	2
DAILY NEWSPAPERS	17	9	8	0
WEEKLY NEWSPAPERS	24	24	0	0
MAGAZINES	37	-	37	13

MARKET 082 SPRINGFIELD,MASSACHUSETTS HOMES: 189,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	90	31	59	20
OWNERS	72	26	46	16
TV STATIONS	15	3	12	1
RADIO STATIONS	20	14	6	3
DAILY NEWSPAPERS	13	5	8	1
WEEKLY NEWSPAPERS	9	9	0	0
MAGAZINES	33	-	33	15

MARKET 083 SIOUX FALLS-ABERDEEN, SOUTH DAKOTA HOMES: 182,100

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	283	180	105	23
OWNERS	224	148	76	18
TV STATIONS	25	6	19	0
RADIO STATIONS	64	23	41	5
DAILY NEWSPAPERS	17	7	10	1
WEEKLY NEWSPAPERS	142	142	0	0
MAGAZINES	35	-	35	17

MARKET 084 FORT WAYNE, INDIANA HOMES: 181,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	134	57	77	17
OWNERS	108	50	58	15
TV STATIONS	19	3	16	0
RADIO STATIONS	33	16	17	1
DAILY NEWSPAPERS	20	11	9	1
WEEKLY NEWSPAPERS	27	27	0	0
MAGAZINES	35	-	35	15

MARKET 085 BRISTOL VA. JOHNSON CITY, TENNESSEE HOMES: 178,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	142	57	85	19
OWNERS	119	50	69	17
TV STATIONS	23	3	20	2
RADIO STATIONS	50	28	22	1
DAILY NEWSPAPERS	16	8	8	1
WEEKLY NEWSPAPERS	18	18	0	0
MAGAZINES	35	-	35	15

MARKET 086 PEORIA, ILLINOIS HOMES: 173,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	133	67	66	18
OWNERS	97	47	50	15
TV STATIONS	12	3	9	0
RADIO STATIONS	25	12	13	1
DAILY NEWSPAPERS	14	5	9	0
WEEKLY NEWSPAPERS	47	47	0	0
MAGAZINES	35	-	35	17

MARKET 087 SOUTH BEND-ELKART, INDIANA HOMES: 165,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	119	46	73	22
OWNERS	88	36	52	18
TV STATIONS	12	3	9	0
RADIO STATIONS	32	13	19	5
DAILY NEWSPAPERS	17	7	10	1
WEEKLY NEWSPAPERS	23	23	0	0
MAGAZINES	35	-	35	16

MARKET 088 EVANSVILLE, INDIANA HOMES: 162,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	131	56	75	15
OWNERS	113	48	65	14
TV STATIONS	14	3	11	0
RADIO STATIONS	38	17	21	1
DAILY NEWSPAPERS	16	9	7	0
WEEKLY NEWSPAPERS	27	27	0	0
MAGAZINES	36	-	36	14

MARKET 089 DULUTH, MINNESOTA HOMES: 157,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	138	68	70	16
OWNERS	106	55	51	13
TV STATIONS	15	4	11	0
RADIO STATIONS	34	19	15	0
DAILY NEWSPAPERS	17	8	9	1
WEEKLY NEWSPAPERS	37	37	0	0
MAGAZINES	35	-	35	15

MARKET 090 AUGUSTA, GEORGIA HOMES: 157,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	164	75	89	15
OWNERS	135	68	67	14
TV STATIONS	18	3	15	0
RADIO STATIONS	56	27	29	1
DAILY NEWSPAPERS	15	4	11	1
WEEKLY NEWSPAPERS	41	41	0	0
MAGAZINES	34	-	34	13

MARKET 091 WEST PALM BEACH,FLORIDA HOMES: 156,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	109	44	65	20
OWNERS	91	39	52	17
TV STATIONS	12	3	9	3
RADIO STATIONS	33	21	12	2
DAILY NEWSPAPERS	12	3	9	1
WEEKLY NEWSPAPERS	17	17	0	0
MAGAZINES	35	-	35	14

MARKET 092 AMARILLO,TEXAS HOMES: 155,900

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	172	95	79	15
OWNERS	145	81	64	14
TV STATIONS	18	6	12	0
RADIO STATIONS	54	31	23	1
DAILY NEWSPAPERS	18	10	8	0
WEEKLY NEWSPAPERS	46	46	0	0
MAGAZINES	36	-	36	14

MARKET 093 SALINAS-MONTEREY,CALIFORNIA HOMES: 155,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	123	44	79	24
OWNERS	99	38	61	19
TV STATIONS	19	4	15	3
RADIO STATIONS	36	17	19	3
DAILY NEWSPAPERS	17	7	10	2
WEEKLY NEWSPAPERS	16	16	0	0
MAGAZINES	35	-	35	16

MARKET 094 SPRINGFIELD,MISSOURI HOMES: 155,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	199	94	105	15
OWNERS	151	70	81	14
TV STATIONS	21	3	18	0
RADIO STATIONS	59	23	36	0
DAILY NEWSPAPERS	21	7	14	0
WEEKLY NEWSPAPERS	61	61	0	0
MAGAZINES	37	-	37	15

MARKET 095 FARGO,NORTH DAKOTA HOMES: 153,90

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	162	99	63	20
OWNERS	137	88	49	16
TV STATIONS	9	4	5	0
RADIO STATIONS	39	20	19	3
DAILY NEWSPAPERS	12	7	5	1
WEEKLY NEWSPAPERS	68	68	0	0
MAGAZINES	34	-	34	16

MARKET 096 BATON ROUGE,LOUISIANA HOMES: 153,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	110	45	65	16
OWNERS	90	36	54	15
TV STATIONS	9	2	7	0
RADIO STATIONS	31	14	17	4
DAILY NEWSPAPERS	11	4	7	0
WEEKLY NEWSPAPERS	25	25	0	0
MAGAZINES	34	-	34	12

MARKET 097 LANSING,MICHIGAN HOMES: 153,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	97	31	66	22
OWNERS	78	26	52	18
TV STATIONS	15	2	13	2
RADIO STATIONS	21	10	11	2
DAILY NEWSPAPERS	11	3	8	1
WEEKLY NEWSPAPERS	16	16	0	0
MAGAZINES	34	-	34	17

MARKET 098 ROCKFORD,ILLINOIS HOMES: 151,900

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	116	47	69	23
OWNERS	95	40	55	20
TV STATIONS	18	3	15	1
RADIO STATIONS	32	19	13	6
DAILY NEWSPAPERS	12	6	6	0
WEEKLY NEWSPAPERS	19	19	0	0
MAGAZINES	35	-	35	16

MARKET 099 COLUMBUS, GEORGIA — HOMES: 151,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	129	43	86	12
OWNERS	99	32	67	12
TV STATIONS	12	2	10	0
RADIO STATIONS	48	16	32	1
DAILY NEWSPAPERS	15	5	10	0
WEEKLY NEWSPAPERS	20	20	0	0
MAGAZINES	34	-	34	11

MARKET 100 COLUMBIA, SOUTH CAROLINA — HOMES: 150,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	102	32	70	13
OWNERS	84	27	57	11
TV STATIONS	13	3	10	0
RADIO STATIONS	38	17	21	0
DAILY NEWSPAPERS	9	4	5	0
WEEKLY NEWSPAPERS	8	8	0	0
MAGAZINES	34	-	34	13

MARKET 101 WHEELING W VA-STEUBENVILLE, OHIO — HOMES: 148,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	119	40	79	17
OWNERS	95	34	61	14
TV STATIONS	20	2	18	3
RADIO STATIONS	27	11	16	1
DAILY NEWSPAPERS	17	8	9	0
WEEKLY NEWSPAPERS	19	19	0	0
MAGAZINES	36	-	36	13

MARKET 102 WACO-TEMPLE, TEXAS — HOMES: 147,500

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	140	55	85	17
OWNERS	111	48	63	15
TV STATIONS	15	3	12	2
RADIO STATIONS	38	13	25	1
DAILY NEWSPAPERS	18	7	11	0
WEEKLY NEWSPAPERS	32	32	0	0
MAGAZINES	37	-	37	14

MARKET 103 WICHITA FALLS, TEXAS-LAWTON, OKLAHOMA HOMES: 147,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	146	72	74	18
OWNERS	116	63	53	16
TV STATIONS	12	3	9	0
RADIO STATIONS	35	17	18	3
DAILY NEWSPAPERS	19	9	10	1
WEEKLY NEWSPAPERS	43	43	0	0
MAGAZINES	37	-	37	14

MARKET 104 EL PASO, TEXAS HOMES: 143,500

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	90	34	56	16
OWNERS	76	29	47	13
TV STATIONS	13	3	10	0
RADIO STATIONS	26	17	9	2
DAILY NEWSPAPERS	6	5	1	0
WEEKLY NEWSPAPERS	9	9	0	0
MAGAZINES	36	-	36	14

MARKET 105 TERRE HAUTE, INDIANA HOMES: 143,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	178	75	103	22
OWNERS	146	70	76	21
TV STATIONS	18	2	16	2
RADIO STATIONS	58	18	40	5
DAILY NEWSPAPERS	29	17	12	1
WEEKLY NEWSPAPERS	38	38	0	0
MAGAZINES	35	-	35	14

MARKET 106 HUNTSVILLE-DECATUR-FLORENCE, ALABAMA HOMES: 141,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	96	40	56	18
OWNERS	80	34	46	16
TV STATIONS	13	4	9	1
RADIO STATIONS	28	23	5	1
DAILY NEWSPAPERS	11	4	7	1
WEEKLY NEWSPAPERS	9	9	0	0
MAGAZINES	35	-	35	15

MARKET 107 BEAUMONT-PORT ARTHUR,TEXAS HOMES: 141,100

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	103	35	68	12
OWNERS	90	33	57	10
TV STATIONS	13	3	10	0
RADIO STATIONS	34	15	19	0
DAILY NEWSPAPERS	8	4	4	0
WEEKLY NEWSPAPERS	13	13	0	0
MAGAZINES	35	-	35	12

MARKET 108 MADISON,WISCONSIN HOMES: 140,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	142	66	76	19
OWNERS	116	58	58	17
TV STATIONS	17	3	14	0
RADIO STATIONS	34	16	18	2
DAILY NEWSPAPERS	14	5	9	0
WEEKLY NEWSPAPERS	42	42	0	0
MAGAZINES	35	-	35	17

MARKET 109 MONROE LA-EL DORADO,ARKANSAS HOMES: 139,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	122	49	73	12
OWNERS	105	46	59	11
TV STATIONS	13	2	11	0
RADIO STATIONS	43	23	20	1
DAILY NEWSPAPERS	14	6	8	1
WEEKLY NEWSPAPERS	18	18	0	0
MAGAZINES	34	-	34	10

MARKET 110 COLORADO SPRINGS-PUEBLO,COLORADO HOMES: 138,500

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	121	55	66	22
OWNERS	104	51	53	19
TV STATIONS	10	3	7	0
RADIO STATIONS	42	20	22	3
DAILY NEWSPAPERS	11	9	2	2
WEEKLY NEWSPAPERS	23	23	0	0
MAGAZINES	35	-	35	17

MARKET 111 TUCSON, ARIZONA — HOMES: 138,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	97	38	59	16
OWNERS	84	35	49	14
TV STATIONS	11	4	7	0
RADIO STATIONS	30	18	12	1
DAILY NEWSPAPERS	11	5	6	0
WEEKLY NEWSPAPERS	11	11	0	0
MAGAZINES	34	-	34	15

MARKET 112 BINGHAMTON, NEW YORK — HOMES: 138,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	129	39	90	20
OWNERS	108	35	73	18
TV STATIONS	21	3	18	0
RADIO STATIONS	36	10	26	3
DAILY NEWSPAPERS	19	5	14	1
WEEKLY NEWSPAPERS	21	21	0	0
MAGAZINES	32	-	32	16

MARKET 113 CHARLESTON, SOUTH CAROLINA — HOMES: 138,100

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	91	31	60	11
OWNERS	78	29	49	10
TV STATIONS	9	3	6	0
RADIO STATIONS	31	18	13	0
DAILY NEWSPAPERS	8	2	6	0
WEEKLY NEWSPAPERS	8	8	0	0
MAGAZINES	35	-	35	11

MARKET 114 BURLINGTON VT.-PLATTSBURG, NEW YORK — HOMES: 136,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	119	47	72	21
OWNERS	97	43	54	19
TV STATIONS	17	3	14	1
RADIO STATIONS	30	20	10	1
DAILY NEWSPAPERS	22	8	14	0
WEEKLY NEWSPAPERS	16	16	0	0
MAGAZINES	34	-	34	19

MARKET 115 MONTGOMERY, ALABAMA — HOMES: 134,900

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	106	40	66	11
OWNERS	95	39	56	11
TV STATIONS	13	3	10	0
RADIO STATIONS	38	20	18	1
DAILY NEWSPAPERS	8	4	4	0
WEEKLY NEWSPAPERS	13	13	0	0
MAGAZINES	34	-	34	10

MARKET 116 SIOUX CITY, IOWA — HOMES: 133,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	194	112	82	24
OWNERS	160	99	61	21
TV STATIONS	16	3	13	1
RADIO STATIONS	44	17	27	4
DAILY NEWSPAPERS	13	6	7	2
WEEKLY NEWSPAPERS	86	86	0	0
MAGAZINES	35	-	35	17

MARKET 117 YOUNGSTOWN, OHIO — HOMES: 133,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	83	27	56	16
OWNERS	68	22	46	14
TV STATIONS	13	3	10	0
RADIO STATIONS	16	10	6	4
DAILY NEWSPAPERS	10	5	5	0
WEEKLY NEWSPAPERS	9	9	0	0
MAGAZINES	35	-	35	12

MARKET 118 UTICA, NEW YORK — HOMES: 132,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	90	28	62	24
OWNERS	73	27	46	19
TV STATIONS	15	1	14	3
RADIO STATIONS	19	11	8	3
DAILY NEWSPAPERS	12	6	6	1
WEEKLY NEWSPAPERS	10	10	0	0
MAGAZINES	34	-	34	17

MARKET 119 JOPLIN,MISSOURI HOMES: 131,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	171	83	88	20
OWNERS	133	71	62	18
TV STATIONS	14	3	11	0
RADIO STATIONS	41	17	24	2
DAILY NEWSPAPERS	30	16	14	1
WEEKLY NEWSPAPERS	47	47	0	0
MAGAZINES	39	-	39	17

MARKET 120 LAFAYETTE,LOUISIANA HOMES: 128,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	93	32	61	16
OWNERS	77	29	48	15
TV STATIONS	10	3	7	3
RADIO STATIONS	28	13	15	3
DAILY NEWSPAPERS	11	5	6	1
WEEKLY NEWSPAPERS	11	11	0	0
MAGAZINES	33	-	33	9

MARKET 121 CORPUS CHRISTI,TEXAS HOMES: 125,900

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	89	42	47	12
OWNERS	73	34	39	11
TV STATIONS	6	3	3	0
RADIO STATIONS	19	14	5	1
DAILY NEWSPAPERS	7	3	4	0
WEEKLY NEWSPAPERS	22	22	0	0
MAGAZINES	35	-	35	11

MARKET 122 QUINCY,ILLINOIS HOMES: 122,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	171	78	93	28
OWNERS	133	62	71	25
TV STATIONS	18	3	15	0
RADIO STATIONS	41	14	27	8
DAILY NEWSPAPERS	22	9	13	1
WEEKLY NEWSPAPERS	52	52	0	0
MAGAZINES	38	-	38	19

MARKET 123 YAKIMA, WASHINGTON — HOMES: 121,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	102	53	50	16
OWNERS	83	43	40	14
TV STATIONS	16	5	11	2
RADIO STATIONS	27	24	3	1
DAILY NEWSPAPERS	7	5	2	0
WEEKLY NEWSPAPERS	18	18	0	0
MAGAZINES	34	-	34	13

MARKET 124 LEXINGTON, KENTUCKY — HOMES: 120,500

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	104	37	67	18
OWNERS	90	34	56	15
TV STATIONS	13	3	10	0
RADIO STATIONS	36	14	22	3
DAILY NEWSPAPERS	8	6	2	1
WEEKLY NEWSPAPERS	14	14	0	0
MAGAZINES	33	-	33	14

MARKET 125 LUBBOCK, TEXAS — HOMES: 120,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	131	59	72	16
OWNERS	103	49	54	15
TV STATIONS	16	5	11	0
RADIO STATIONS	37	22	15	2
DAILY NEWSPAPERS	12	3	9	0
WEEKLY NEWSPAPERS	29	29	0	0
MAGAZINES	37	-	37	14

MARKET 126 COLUMBIA-JEFFERSON CITY, MISSOURI — HOMES: 117,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	142	65	77	25
OWNERS	111	52	59	21
TV STATIONS	16	3	13	0
RADIO STATIONS	35	15	20	2
DAILY NEWSPAPERS	19	11	8	4
WEEKLY NEWSPAPERS	36	36	0	0
MAGAZINES	36	-	36	19

MARKET 127 ODESSA-MIDLAND,TEXAS HOMES: 115,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	128	42	86	19
OWNERS	107	40	67	17
TV STATIONS	12	3	9	1
RADIO STATIONS	47	14	33	4
DAILY NEWSPAPERS	10	3	7	2
WEEKLY NEWSPAPERS	22	22	0	0
MAGAZINES	37	-	37	12

MARKET 128 MINOT-BISMARCK,NORTH DAKOTA HOMES: 112,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	195	110	85	18
OWNERS	156	92	64	16
TV STATIONS	19	7	12	0
RADIO STATIONS	49	19	30	2
DAILY NEWSPAPERS	14	5	9	0
WEEKLY NEWSPAPERS	79	79	0	0
MAGAZINES	34	-	34	16

MARKET 129 AUSTIN,TEXAS HOMES: 111,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	117	39	78	19
OWNERS	94	36	58	15
TV STATIONS	14	2	12	0
RADIO STATIONS	34	14	20	2
DAILY NEWSPAPERS	12	3	9	0
WEEKLY NEWSPAPERS	20	20	0	0
MAGAZINES	37	-	37	17

MARKET 130 TOPEKA,KANSAS HOMES: 109,100

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	130	56	74	28
OWNERS	107	47	60	23
TV STATIONS	12	2	10	3
RADIO STATIONS	30	9	21	4
DAILY NEWSPAPERS	15	8	7	2
WEEKLY NEWSPAPERS	37	37	0	0
MAGAZINES	36	-	36	19

MARKET 131 SAVANNAH, GEORGIA HOMES: 108,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	93	28	65	15
OWNERS	80	25	55	13
TV STATIONS	11	2	9	0
RADIO STATIONS	30	13	17	2
DAILY NEWSPAPERS	7	2	5	0
WEEKLY NEWSPAPERS	11	11	0	0
MAGAZINES	34	-	34	13

MARKET 132 EUGENE, OREGON HOMES: 108,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	91	43	48	20
OWNERS	80	40	40	16
TV STATIONS	10	4	6	1
RADIO STATIONS	24	20	4	1
DAILY NEWSPAPERS	6	3	3	1
WEEKLY NEWSPAPERS	16	16	0	0
MAGAZINES	35	-	35	17

MARKET 133 MACON, GEORGIA HOMES: 107,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	84	31	53	16
OWNERS	70	28	42	15
TV STATIONS	10	2	8	2
RADIO STATIONS	24	15	9	1
DAILY NEWSPAPERS	4	2	2	0
WEEKLY NEWSPAPERS	12	12	0	0
MAGAZINES	34	-	34	13

MARKET 134 BAKERSFIELD, CALIFORNIA HOMES: 107,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	85	31	54	18
OWNERS	74	29	45	15
TV STATIONS	15	3	12	1
RADIO STATIONS	16	14	2	1
DAILY NEWSPAPERS	7	2	5	2
WEEKLY NEWSPAPERS	12	12	0	0
MAGAZINES	35	-	35	14

MARKET 135 LA CROSSE-EAU CLAIRE, WISCONSIN HOMES: 106,40(

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	150	68	82	20
OWNERS	113	57	56	17
TV STATIONS	18	3	15	1
RADIO STATIONS	39	19	20	3
DAILY NEWSPAPERS	17	5	12	0
WEEKLY NEWSPAPERS	41	41	0	0
MAGAZINES	35	-	35	16

MARKET 136 ABILENE-SWEETWATER, TEXAS HOMES: 105,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	136	54	82	19
OWNERS	107	47	60	18
TV STATIONS	16	3	13	1
RADIO STATIONS	39	13	26	4
DAILY NEWSPAPERS	11	5	6	0
WEEKLY NEWSPAPERS	33	33	0	0
MAGAZINES	37	-	37	18

MARKET 137 ROCHESTER MINN-MASON CITY, IOWA HOMES: 104,100

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	130	40	90	28
OWNERS	100	34	66	22
TV STATIONS	15	3	12	0
RADIO STATIONS	38	5	33	11
DAILY NEWSPAPERS	15	5	10	2
WEEKLY NEWSPAPERS	27	27	0	0
MAGAZINES	35	-	35	15

MARKET 138 TALLAHASSEE, FLORIDA HOMES: 103,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	125	45	80	17
OWNERS	107	44	63	15
TV STATIONS	8	1	7	2
RADIO STATIONS	54	23	31	2
DAILY NEWSPAPERS	11	3	8	1
WEEKLY NEWSPAPERS	18	18	0	0
MAGAZINES	34	-	34	12

MARKET 139 ERIE, PENNSYLVANIA — HOMES: 102,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	78	22	56	17
OWNERS	66	18	48	15
TV STATIONS	14	3	11	0
RADIO STATIONS	17	11	6	1
DAILY NEWSPAPERS	10	5	5	0
WEEKLY NEWSPAPERS	3	3	0	0
MAGAZINES	34	-	34	16

MARKET 140 WILMINGTON, NORTH CAROLINA — HOMES: 99,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	104	33	71	21
OWNERS	91	30	61	19
TV STATIONS	13	2	11	1
RADIO STATIONS	32	14	18	5
DAILY NEWSPAPERS	11	3	8	1
WEEKLY NEWSPAPERS	14	14	0	0
MAGAZINES	34	-	34	14

MARKET 141 LOWER RIO GRANDE VALLEY, TEXAS — HOMES: 97,900

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	70	27	43	9
OWNERS	57	21	36	8
TV STATIONS	6	2	4	0
RADIO STATIONS	10	9	1	0
DAILY NEWSPAPERS	8	4	4	1
WEEKLY NEWSPAPERS	12	12	0	0
MAGAZINES	34	-	34	8

MARKET 142 CHICO-REDDING, CALIFORNIA — HOMES: 97,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.
MEDIA	115	39	76	25
OWNERS	98	38	60	23
TV STATIONS	16	2	14	1
RADIO STATIONS	36	17	19	7
DAILY NEWSPAPERS	16	7	9	2
WEEKLY NEWSPAPERS	13	13	0	0
MAGAZINES	34	-	34	15

MARKET 143 LAS VEGAS,NEVADA HOMES: 95,900

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	70	22	48	13
OWNERS	56	19	37	10
TV STATIONS	7	4	3	0
RADIO STATIONS	15	11	4	0
DAILY NEWSPAPERS	9	2	7	0
WEEKLY NEWSPAPERS	5	5	0	0
MAGAZINES	34	-	34	13

MARKET 144 WAUSAU-RHINELANDER,WISCONSIN HOMES: 95,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	113	43	70	19
OWNERS	88	35	53	16
TV STATIONS	9	2	7	2
RADIO STATIONS	31	13	18	0
DAILY NEWSPAPERS	17	7	10	2
WEEKLY NEWSPAPERS	21	21	0	0
MAGAZINES	35	-	35	15

MARKET 145 TRAVERSE CITY-CADILLAC MICHIGAN HOMES: 91,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	145	66	79	23
OWNERS	120	57	63	21
TV STATIONS	15	4	11	0
RADIO STATIONS	47	13	29	2
DAILY NEWSPAPERS	15	9	6	2
WEEKLY NEWSPAPERS	35	35	0	0
MAGAZINES	33	-	33	19

MARKET 146 BOISE,IDAHO HOMES: 91,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	92	44	48	18
OWNERS	79	40	39	15
TV STATIONS	10	3	7	0
RADIO STATIONS	21	17	4	1
DAILY NEWSPAPERS	6	4	2	0
WEEKLY NEWSPAPERS	20	20	0	0
MAGAZINES	35	-	35	17

MARKET 147 SANTA BARBARA, CALIFORNIA HOMES: 86,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	72	20	52	25
OWNERS	64	19	45	23
TV STATIONS	13	2	11	6
RADIO STATIONS	14	11	3	3
DAILY NEWSPAPERS	6	3	3	1
WEEKLY NEWSPAPERS	4	4	0	0
MAGAZINES	35	-	35	15

MARKET 148 ALBANY, GEORGIA HOMES: 80,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	118	42	76	17
OWNERS	97	39	58	15
TV STATIONS	10	1	9	3
RADIO STATIONS	48	19	29	0
DAILY NEWSPAPERS	9	3	6	2
WEEKLY NEWSPAPERS	19	19	0	0
MAGAZINES	32	-	32	12

MARKET 149 BANGOR, MAINE HOMES: 80,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	77	30	47	16
OWNERS	65	28	37	14
TV STATIONS	6	3	3	0
RADIO STATIONS	16	11	5	1
DAILY NEWSPAPERS	8	1	7	1
WEEKLY NEWSPAPERS	15	15	0	0
MAGAZINES	32	-	32	14

MARKET 150 FLORENCE, SOUTH CAROLINA HOMES: 77,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	95	30	65	17
OWNERS	83	29	54	16
TV STATIONS	14	1	13	1
RADIO STATIONS	29	15	14	1
DAILY NEWSPAPERS	9	1	8	3
WEEKLY NEWSPAPERS	13	13	0	0
MAGAZINES	30	-	30	12

MARKET 151 MERIDIAN, MISSISSIPPI — HOMES: 76,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	109	30	79	10
OWNERS	87	27	60	10
TV STATIONS	15	2	13	2
RADIO STATIONS	36	11	25	2
DAILY NEWSPAPERS	13	1	12	0
WEEKLY NEWSPAPERS	16	16	0	0
MAGAZINES	29	-	29	6

MARKET 152 DOTHAN, ALABAMA — HOMES: 74,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	106	30	76	20
OWNERS	89	27	62	18
TV STATIONS	8	1	7	2
RADIO STATIONS	33	13	20	2
DAILY NEWSPAPERS	15	2	13	2
WEEKLY NEWSPAPERS	14	14	0	0
MAGAZINES	36	-	36	14

MARKET 153 BLUEFIELD, WEST VIRGINIA — HOMES: 73,100

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	86	27	59	22
OWNERS	70	24	46	20
TV STATIONS	9	1	8	5
RADIO STATIONS	22	10	12	3
DAILY NEWSPAPERS	11	4	7	2
WEEKLY NEWSPAPERS	12	12	0	0
MAGAZINES	32	-	32	12

MARKET 154 RENO, NEVADA — HOMES: 70,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	113	29	84	20
OWNERS	87	24	63	17
TV STATIONS	17	3	14	0
RADIO STATIONS	37	11	26	2
DAILY NEWSPAPERS	14	4	10	1
WEEKLY NEWSPAPERS	11	11	0	0
MAGAZINES	34	-	34	17

MARKET 155 WATERTOWN-CARTHAGE, NEW YORK HOMES: 70,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	74	19	55	23
OWNERS	60	14	46	20
TV STATIONS	10	1	9	2
RADIO STATIONS	15	8	7	2
DAILY NEWSPAPERS	7	2	5	1
WEEKLY NEWSPAPERS	8	8	0	0
MAGAZINES	34	-	34	18

MARKET 156 CHEYENNE, WYOMING HOMES: 64,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	114	45	69	26
OWNERS	96	38	53	21
TV STATIONS	13	3	10	3
RADIO STATIONS	31	13	18	3
DAILY NEWSPAPERS	11	6	5	3
WEEKLY NEWSPAPERS	23	23	0	0
MAGAZINES	36	-	36	17

MARKET 157 ALEXANDRIA, MINNESOTA HOMES: 64,100

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	136	65	73	25
OWNERS	108	54	54	19
TV STATIONS	12	2	10	1
RADIO STATIONS	35	10	25	7
DAILY NEWSPAPERS	10	3	7	2
WEEKLY NEWSPAPERS	50	50	0	0
MAGAZINES	31	-	31	15

MARKET 158 FORT SMITH, ARKANSAS HOMES: 61,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	91	35	56	15
OWNERS	73	29	44	14
TV STATIONS	7	1	6	2
RADIO STATIONS	16	10	6	0
DAILY NEWSPAPERS	9	2	7	0
WEEKLY NEWSPAPERS	22	22	0	0
MAGAZINES	37	-	37	13

MARKET 159 BILLINGS, MONTANA HOMES: 61,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	104	44	60	20
OWNERS	88	40	48	18
TV STATIONS	12	2	10	0
RADIO STATIONS	29	16	13	2
DAILY NEWSPAPERS	8	8	8	0
WEEKLY NEWSPAPERS	22	22	0	0
MAGAZINES	33	-	33	18

MARKET 160 IDAHO FALLS-POCATELLO, IDAHO HOMES: 59,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	92	36	56	19
OWNERS	76	31	45	16
TV STATIONS	9	3	6	0
RADIO STATIONS	22	12	10	2
DAILY NEWSPAPERS	9	3	6	1
WEEKLY NEWSPAPERS	18	18	0	0
MAGAZINES	34	-	34	16

MARKET 161 ST. JOSEPH, MISSOURI HOMES: 58,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	104	24	80	24
OWNERS	78	22	56	20
TV STATIONS	13	1	12	3
RADIO STATIONS	23	5	18	5
DAILY NEWSPAPERS	14	3	11	2
WEEKLY NEWSPAPERS	15	15	0	0
MAGAZINES	39	-	39	14

MARKET 162 COLUMBUS, MISSISSIPPI HOMES: 57,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	90	25	65	15
OWNERS	73	23	50	15
TV STATIONS	11	1	10	1
RADIO STATIONS	26	10	16	4
DAILY NEWSPAPERS	10	3	7	2
WEEKLY NEWSPAPERS	11	11	0	0
MAGAZINES	32	-	32	8

MARKET 163 GREAT FALLS,MONTANA HOMES: 56,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	80	25	55	21
OWNERS	68	23	45	19
TV STATIONS	11	2	9	0
RADIO STATIONS	15	3	12	5
DAILY NEWSPAPERS	4	3	1	0
WEEKLY NEWSPAPERS	17	17	0	0
MAGAZINES	33	-	33	16

MARKET 164 ALEXANDRIA,LOUISIANA HOMES: 55,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	69	13	56	16
OWNERS	58	11	47	16
TV STATIONS	10	1	9	3
RADIO STATIONS	12	5	7	2
DAILY NEWSPAPERS	9	1	8	1
WEEKLY NEWSPAPERS	6	6	0	0
MAGAZINES	32	-	32	10

MARKET 165 LAUREL-HATTIESBURG,MISSISSIPPI HOMES: 50,500

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	68	16	52	13
OWNERS	55	16	39	13
TV STATIONS	8	1	7	3
RADIO STATIONS	16	9	7	3
DAILY NEWSPAPERS	7	2	5	1
WEEKLY NEWSPAPERS	4	4	0	0
MAGAZINES	33	-	33	6

MARKET 166 CLARKSBURG-WESTON,WEST VIRGINIA HOMES: 50,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	75	27	48	17
OWNERS	65	24	41	15
TV STATIONS	9	2	7	3
RADIO STATIONS	13	7	6	2
DAILY NEWSPAPERS	7	6	1	0
WEEKLY NEWSPAPERS	12	12	0	0
MAGAZINES	34	-	34	12

MARKET 167 LAKE CHARLES,LOUISIANA HOMES: 50,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	47	6	41	16
OWNERS	41	5	36	15
TV STATIONS	6	1	5	5
RADIO STATIONS	6	4	2	2
DAILY NEWSPAPERS	5	1	4	0
WEEKLY NEWSPAPERS	0	0	0	0
MAGAZINES	30	-	30	9

MARKET 168 MARQUETTE,MICHIGAN HOMES: 49,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	78	26	52	23
OWNERS	65	22	43	19
TV STATIONS	6	1	5	2
RADIO STATIONS	17	10	7	1
DAILY NEWSPAPERS	8	3	5	3
WEEKLY NEWSPAPERS	12	12	0	0
MAGAZINES	35	-	35	17

MARKET 169 RAPID CITY,SOUTH DAKOTA HOMES: 48,700

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	113	43	72	17
OWNERS	90	32	58	14
TV STATIONS	13	5	8	0
RADIO STATIONS	33	10	23	1
DAILY NEWSPAPERS	9	3	6	0
WEEKLY NEWSPAPERS	23	23	0	0
MAGAZINES	35	-	35	16

MARKET 170 MANKATO,MINNESOTA HOMES: 48,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	122	48	74	27
OWNERS	99	44	55	20
TV STATIONS	14	1	13	2
RADIO STATIONS	27	8	19	7
DAILY NEWSPAPERS	13	3	10	3
WEEKLY NEWSPAPERS	36	36	0	0
MAGAZINES	32	-	32	15

MARKET 171 OTTUMWA, IOWA — HOMES: 48,100

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	103	29	74	25
OWNERS	81	22	59	21
TV STATIONS	15	1	14	3
RADIO STATIONS	25	7	18	5
DAILY NEWSPAPERS	13	4	9	2
WEEKLY NEWSPAPERS	17	17	0	0
MAGAZINES	33	-	33	15

MARKET 172 ARDMORE-ADA, OKLAHOMA — HOMES: 46,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	99	27	72	22
OWNERS	81	24	57	18
TV STATIONS	14	2	12	2
RADIO STATIONS	28	6	22	4
DAILY NEWSPAPERS	10	4	6	2
WEEKLY NEWSPAPERS	15	15	0	0
MAGAZINES	32	-	32	14

MARKET 173 MEDFORD, OREGON — HOMES: 45,900

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	58	16	42	19
OWNERS	48	12	36	17
TV STATIONS	5	2	3	0
RADIO STATIONS	10	9	1	1
DAILY NEWSPAPERS	6	2	4	2
WEEKLY NEWSPAPERS	3	3	0	0
MAGAZINES	34	-	34	16

MARKET 174 EUREKA, CALIFORNIA — HOMES: 45,500

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	77	19	58	24
OWNERS	66	18	48	22
TV STATIONS	8	2	6	0
RADIO STATIONS	17	5	12	7
DAILY NEWSPAPERS	6	1	5	1
WEEKLY NEWSPAPERS	11	11	0	0
MAGAZINES	35	-	35	16

MARKET 175 GREENWOOD, MISSISSIPPI HOMES: 45,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	74	16	58	18
OWNERS	58	15	43	17
TV STATIONS	11	1	10	4
RADIO STATIONS	22	8	14	7
DAILY NEWSPAPERS	7	2	5	1
WEEKLY NEWSPAPERS	5	5	0	0
MAGAZINES	29	-	29	6

MARKET 176 CASPER-RIVERTON, WYOMING HOMES: 45,200

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	103	28	75	36
OWNERS	82	25	57	27
TV STATIONS	13	2	11	1
RADIO STATIONS	25	14	11	1
DAILY NEWSPAPERS	9	4	5	1
WEEKLY NEWSPAPERS	8	8	0	0
MAGAZINES	48	-	48	33

MARKET 177 TYLER, TEXAS HOMES: 45,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	84	22	62	19
OWNERS	68	19	49	13
TV STATIONS	9	1	8	3
RADIO STATIONS	23	9	14	1
DAILY NEWSPAPERS	8	2	6	1
WEEKLY NEWSPAPERS	10	10	0	0
MAGAZINES	34	-	34	14

MARKET 178 BILOXI, MISSISSIPPI HOMES: 42,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	61	12	49	22
OWNERS	50	11	39	18
TV STATIONS	8	1	7	3
RADIO STATIONS	11	7	4	4
DAILY NEWSPAPERS	6	1	5	1
WEEKLY NEWSPAPERS	3	3	0	0
MAGAZINES	33	-	33	14

MARKET 179 ROSWELL, NEW MEXICO HOMES: 40,900

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	71	16	55	19
OWNERS	62	14	48	17
TV STATIONS	9	2	7	2
RADIO STATIONS	21	10	11	2
DAILY NEWSPAPERS	7	3	4	2
WEEKLY NEWSPAPERS	1	1	0	0
MAGAZINES	33	-	33	13

MARKET 180 YUMA, ARIZONA HOMES: 40,500

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	79	14	65	26
OWNERS	65	12	53	24
TV STATIONS	17	3	14	2
RADIO STATIONS	16	3	13	8
DAILY NEWSPAPERS	8	3	5	3
WEEKLY NEWSPAPERS	5	5	0	0
MAGAZINES	33	-	33	13

MARKET 181 BUTTE, MONTANA HOMES: 40,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	80	23	57	21
OWNERS	62	22	40	19
TV STATIONS	10	2	8	3
RADIO STATIONS	22	10	12	1
DAILY NEWSPAPERS	8	3	5	0
WEEKLY NEWSPAPERS	8	8	0	0
MAGAZINES	32	-	32	17

MARKET 182 GRAND JUNCTION, COLORADO HOMES: 38,600

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	89	33	56	25
OWNERS	75	29	46	21
TV STATIONS	11	3	8	1
RADIO STATIONS	22	10	12	3
DAILY NEWSPAPERS	5	3	2	2
WEEKLY NEWSPAPERS	17	17	0	0
MAGAZINES	34	-	34	19

MARKET 183 TWIN FALLS, IDAHO — HOMES: 34,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	69	19	50	21
OWNERS	60	19	41	18
TV STATIONS	8	1	7	2
RADIO STATIONS	15	7	8	2
DAILY NEWSPAPERS	5	2	3	1
WEEKLY NEWSPAPERS	9	9	0	0
MAGAZINES	32	-	32	16

MARKET 184 LIMA, OHIO — HOMES: 34,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	63	8	55	25
OWNERS	53	7	46	22
TV STATIONS	10	1	9	4
RADIO STATIONS	8	3	5	5
DAILY NEWSPAPERS	9	2	7	0
WEEKLY NEWSPAPERS	2	2	0	0
MAGAZINES	34	-	34	16

MARKET 185 FORT MYERS, FLORIDA — HOMES: 31,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	57	9	48	17
OWNERS	48	8	40	14
TV STATIONS	10	2	8	1
RADIO STATIONS	5	3	2	2
DAILY NEWSPAPERS	4	1	3	1
WEEKLY NEWSPAPERS	3	3	0	0
MAGAZINES	35	-	35	13

MARKET 186 SALISBURY, MARYLAND — HOMES: 30,900

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	66	13	53	23
OWNERS	51	12	39	17
TV STATIONS	7	1	6	4
RADIO STATIONS	13	6	7	1
DAILY NEWSPAPERS	8	1	7	1
WEEKLY NEWSPAPERS	5	5	0	0
MAGAZINES	33	-	33	17

MARKET 187 HARRISONBURG, VIRGINIA HOMES: 29,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	77	12	65	21
OWNERS	56	11	45	19
TV STATIONS	15	1	14	5
RADIO STATIONS	18	5	13	1
DAILY NEWSPAPERS	8	1	7	0
WEEKLY NEWSPAPERS	5	5	0	0
MAGAZINES	31	-	31	15

MARKET 188 PRESQUE ISLE, MAINE HOMES: 26,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	42	4	38	19
OWNERS	36	3	33	17
TV STATIONS	4	1	3	1
RADIO STATIONS	4	2	2	2
DAILY NEWSPAPERS	3	0	3	1
WEEKLY NEWSPAPERS	1	1	0	0
MAGAZINES	30	-	30	15

MARKET 189 SAN ANGELO, TEXAS HOMES: 26,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	58	12	46	14
OWNERS	49	11	38	13
TV STATIONS	6	2	4	1
RADIO STATIONS	13	5	8	1
DAILY NEWSPAPERS	3	1	2	0
WEEKLY NEWSPAPERS	4	4	0	0
MAGAZINES	32	-	32	12

MARKET 190 BELLINGHAM, WASHINGTON HOMES: 24,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	55	13	42	23
OWNERS	46	13	33	18
TV STATIONS	5	1	4	3
RADIO STATIONS	10	8	2	1
DAILY NEWSPAPERS	3	1	2	1
WEEKLY NEWSPAPERS	3	3	0	0
MAGAZINES	34	-	34	18

MARKET 191 PANAMA CITY,FLORIDA HOMES: 24,300

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	63	17	46	20
OWNERS	57	16	41	18
TV STATIONS	5	1	4	1
RADIO STATIONS	18	10	8	6
DAILY NEWSPAPERS	8	4	4	0
WEEKLY NEWSPAPERS	2	2	0	0
MAGAZINES	30	-	30	13

MARKET 192 ZANESVILLE,OHIO HOMES: 23,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	49	4	45	24
OWNERS	39	2	37	19
TV STATIONS	6	1	5	3
RADIO STATIONS	6	1	5	5
DAILY NEWSPAPERS	5	1	4	1
WEEKLY NEWSPAPERS	1	1	0	0
MAGAZINES	31	-	31	15

MARKET 193 MISSOULA,MONTANA HOMES: 23,400

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	52	11	41	25
OWNERS	45	9	36	23
TV STATIONS	6	2	4	4
RADIO STATIONS	5	2	3	2
DAILY NEWSPAPERS	5	3	2	0
WEEKLY NEWSPAPERS	4	4	0	0
MAGAZINES	32	-	32	19

MARKET 194 HAYS,KANSAS HOMES: 23,100

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	83	24	60	33
OWNERS	71	21	50	30
TV STATIONS	8	2	6	2
RADIO STATIONS	19	3	16	7
DAILY NEWSPAPERS	9	2	7	4
WEEKLY NEWSPAPERS	16	16	0	0
MAGAZINES	31	-	31	20

MARKET 195 LUFKIN,TEXAS HOMES: 22,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	70	13	57	24
OWNERS	60	13	47	21
TV STATIONS	11	2	9	3
RADIO STATIONS	16	4	12	3
DAILY NEWSPAPERS	7	2	5	2
WEEKLY NEWSPAPERS	5	5	0	0
MAGAZINES	31	-	31	16

MARKET 196 LAREDO,TEXAS HOMES: 20,50(

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	54	6	48	19
OWNERS	46	6	40	16
TV STATIONS	10	2	8	3
RADIO STATIONS	14	2	12	6
DAILY NEWSPAPERS	3	1	2	1
WEEKLY NEWSPAPERS	1	1	0	0
MAGAZINES	26	-	26	9

MARKET 197 KLAMATH FALLS,OREGON HOMES: 19,00(

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	52	7	45	21
OWNERS	44	7	37	18
TV STATIONS	8	1	7	2
RADIO STATIONS	9	4	5	1
DAILY NEWSPAPERS	4	1	3	2
WEEKLY NEWSPAPERS	1	1	0	0
MAGAZINES	30	-	30	16

MARKET 198 TUPELO,MISSISSIPPI HOMES: 18,60(

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	51	7	44	23
OWNERS	40	7	33	19
TV STATIONS	5	1	4	4
RADIO STATIONS	11	3	8	5
DAILY NEWSPAPERS	5	1	4	2
WEEKLY NEWSPAPERS	2	2	0	0
MAGAZINES	28	-	28	12

MARKET 199 NORTH PLATTE,NEBRASKA HOMES: 13,800

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	49	13	36	19
OWNERS	44	12	32	17
TV STATIONS	4	1	3	2
RADIO STATIONS	9	4	5	1
DAILY NEWSPAPERS	3	1	2	1
WEEKLY NEWSPAPERS	7	7	0	0
MAGAZINES	26	-	26	15

MARKET 200 PEMBINA,NORTH DAKOTA HOMES: 12,100

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	67	22	45	28
OWNERS	58	22	36	22
TV STATIONS	5	2	3	2
RADIO STATIONS	17	2	15	9
DAILY NEWSPAPERS	4	0	4	2
WEEKLY NEWSPAPERS	18	18	0	0
MAGAZINES	23	-	23	15

MARKET 201 ENSIGN,KANSAS HOMES: 12,000

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	66	13	53	29
OWNERS	55	11	44	26
TV STATIONS	7	1	6	2
RADIO STATIONS	19	2	17	5
DAILY NEWSPAPERS	4	1	3	3
WEEKLY NEWSPAPERS	9	9	0	0
MAGAZINES	27	-	27	19

MARKET 202 HELENA,MONTANA HOMES: 10,00

	TOTAL NO. IN MKT.	NUMBER ORIGINATING IN MKT.	NUMBER ENTERING MKT. TOTAL	+5% OF MKT.
MEDIA	50	6	44	28
OWNERS	41	5	36	24
TV STATIONS	9	1	8	5
RADIO STATIONS	9	2	7	3
DAILY NEWSPAPERS	3	1	2	2
WEEKLY NEWSPAPERS	2	2	0	0
MAGAZINES	27	-	27	18

MARKET 203 JACKSON,TENNESSEE	TOTAL NO. IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.	HOMES: 5,3-(
MEDIA OWNERS	50	47	34	
	38	35	27	
TV STATIONS	7	6	3	
RADIO STATIONS	15	14	13	
DAILY NEWSPAPERS	5	4	4	
WEEKLY NEWSPAPERS	0	0	0	
MAGAZINES	23	23	18	

MARKET 204 GLENDIVE,MONTANA	TOTAL NO. IN MKT.	NUMBER ENTERING MKT. TOTAL	NUMBER ENTERING MKT. +5% OF MKT.	HOMES: 4,600
MEDIA OWNERS	36	31	27	
	30	26	22	
TV STATIONS	5	4	4	
RADIO STATIONS	8	6	5	
DAILY NEWSPAPERS	2	2	2	
WEEKLY NEWSPAPERS	2	0	0	
MAGAZINES	19	19	16	

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[Anderson, "Broadcast Stations and Newspapers: The Problem of Information Control: A Content Analysis of Local News Presentations" (1971) (NAB Exhibit E), pp. 1-46]

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It has been suggested that patterns of multi-media ownership result in both anti-competitive practices and the potential for repressive information control. The former area has been dealt with elsewhere (see Anderson, Coe and Saunders;(1969). It is to the latter – the problem of information control – that this study is addressed.

Perhaps the most serious concern of the information control critics is the pattern of ownership where broadcast outlets are owned in common with the market newspaper. There are approximately 150 markets in the United States where broadcast outlets are owned in that area. The combinations range from newspaper partnership with a small FM radio station to the common ownership of all four media – newspaper, television, AM and FM radio – in the market. Questions concern-

ing the results of singular control of these sources are more than legitimate. Clearly, if one can postulate and defend that a) public information sources for a market are primarily limited to those the market can support; b) the effect on public opinion is proportional to the number of information sources owned; c) forces in the information market place do not prevent the manipulation of information for self-serving purposes, then such questions are vital to the free-market-place-of-ideas foundation of our democracy. The postulates, while perhaps facilely stated, are not easily supported. With the influx of regional newspapers; regional editions of national magazines; the increased availability of broadcast signals; the increased opportunities for travel and education; the continued evidence of active networks of interpersonal communication, information sources do not appear to be limited to those mass media outlets indigenous to a market. Documentation of the ability of a single, even if monolithic, source to dominate public opinion has been notably absent from the scientific literature in the field. Finding the opposite results has been the ordinary case. Finally the previously cited study by Anderson *et al.* indicated that forces in the market place adequately controlled the appearance of anti-competitive practices as a systematic result of patterns of ownership. Could such prevention also be true of information control?

One way to determine an answer is a careful and objective examination of the informational content of both cross-media-owned broadcast outlets and separately owned broadcast outlets. If practices of information control were occurring one would expect to see different ownership conditions. Specifically one would expect a) television outlets commonly owned with a newspaper to evidence greater correspondence on subject matter and

its treatment with that newspaper than separately owned television stations; b) radio outlets commonly owned with a newspaper to show greater agreement in subject matter and its treatment with that newspaper than separately owned radio outlets; c) with the same market, patterns of treatment of the same stories presented by both broadcast station groups to be different; and d) within the same market, the news service rendered by the two ownership groups to be different.

It is the purpose of this study to provide the careful and systematic observation called for, in order to test the above expectations for validity. Systematic and objective observation requires a methodology known as content analysis. This process embraces a large number of activities, ranging from counting the relative frequency of each word in a text to evaluating the relative attitude intensity held by different authors. It has been used to develop dictionaries of common words; identify the textual writers of the old and new testaments; authenticate the dead sea scrolls; and evaluate trends in newspaper comics. As a process it concerns the establishment of clearly defined rules of analysis consistently applied to some content for the purpose of solving some problem. As a procedure content analysis is limited by the a) adequacy of the rules of analysis in measuring the attributes intended; b) the sufficiency of the rules to cover all occurences of the attributes to be measured; c) the consistency of their application; d) the clarity of the relationship between the data gathered and the problem to be solved. In other terms these are the time honored requirements of validity, reliability, and logic. Quite obviously content analysis cannot be generally evaluated. Rules which may be adequate for one problem can be irrelevant to another. Consequently content analytical

techniques must be evaluated in the specific terms of the problem to be solved. The result of this content/problem specificity has been the development of a multiformity of techniques. These include a) sampling methods; to determine the content to be evaluated; b) schemes of categories to identify subject matter; c) attitude measures; d) measures of meaning; e) measure of argumentative position; f) measures of textual characteristics (e.g. adjective/verb ratio); g) measures indicative of the personality characteristics of the author; h) measures of the length, position, and other demographic values of the item analyzed. Along with these measures, ancillary methods determining the reliability, validity, and/or interrelationships of the above measures have been developed. There are several overviews of these measures and methods. Two of particular note are Holsti (1969) and Pool (1959).

There have been a large number of studies dealing with radio and television content including more than 100 relating directly to news content. Bibliographies listing these studies include Holsti (1969), Budd *et al.* (1967), Barcus (1960), and Barnes (1959). Of these numbers there are surprisingly few which deal with the problem at hand. In fact a reasonable search of the literature provides no studies which offer story by story analysis of the news output of radio and television stations operating under different ownership patterns. Perhaps the closest is Baldridge's (1967) study which gives a comparison of programming in general by group and non-group owned television stations.

Not only is the lack of studies precisely pertinent to this realm a problem, but the studies investigating news which are available have used methods inappropriate to our problem. Traditionally such studies have analyzed news content by establishing a limited set of categories

and rules of sorting. Each story then is sorted by the established rules into one of the categories. Comparisons are made by matching the relative frequency generated by another. For example, Thorton's (1970) study of violence, protest, and war in television news, used those three categories to code stories from Canadian and American sources. He found the CBC averaging 29.4 per cent of their total news in these violence categories and CBS 51.3 per cent, for the period of April 20 to May 10, 1970. Obviously this method gives us a startling insight into the difference between Canadian and American television news. But also quite obviously it cannot answer (nor was it intended to) questions about whether the same topics were presented or whether the treatment by each was the same.

A similar example can be drawn from Nixon and Jones (1956) who analyze the content of competitive and non-competitive newspapers. When they report that such newspapers present almost the same percentage of government news they tell us little or nothing about the way these newspapers might be shaping the opinion about the government in their readers. Competitive newspapers might be forced by market pressures to present the more sensational stories; whereas non-competitive newspapers may be able to provide a more balanced view. Of course, the reverse may be true; we simply do not know.

Since in this study we are particularly interested in whether different courses present the same news story and in the same way, these traditional methods are inadequate for the solution for our problem. Consequently a new methodology was developed. By rephrasing our expectations concerning information control into questions, we can determine the comparisons and measures which must be made by this new methodology.

The first question then is stated as: Will television outlets commonly owned with a newspaper evidence greater correspondence with that newspaper on subject matter and its treatment than separately owned stations? This question specifies that each story from a television station owned in common with a newspaper be compared with each story from its allied newspaper to ascertain whether the stories are the same and if so whether the attitudes expressed (treatments) are similar. The same comparison must be made between a separately owned television station and the same newspaper.

Will radio outlets owned with a newspaper show greater agreement in subject matter and its treatment with that newspaper than separately owned radio outlets? The second question, therefore, requires a comparison of each radio outlet selected in the market to be compared with each story similarly presented by the broadcast-media-allied newspaper in that market. Common sense requires the stations to all be in the same market and the stories from the same day. We shall follow these common sense rules throughout.

Content comparisons are always difficult. Cross-media comparisons increase the difficulty according to the number of characteristics unique to each medium. Difficulties plainly exist even in the comparison of radio and television content. E.g. there are not indications that a picture can ever be the same as a set of spoken words (see Anderson, 1965, 1966, 1968a, 1968b, 1969). But generally in news broadcasts the primary mode of presentation is the same – the spoken word. Consequently, the content is presented sequentially, one bit of information at a time, with complete control over the order of reception but almost no reference ability on the part of the receiver. The printed word of the newspaper has only the first of

these characteristics. It does present material sequentially, but presents it all at once and hence has no control over the order in which stories are read but does provide perfect referability for the receiver. Additionally broadcast presentations are severely limited by the practices of their media in the amount of material they can present. Newspapers, while still limited, (newsprint is expensive) usually present several times the material. For our purposes these differences mean we will have to impose some rules concerning the selection of stories and some artificial order to make the comparisons meaningful. These rules are described below under the title "Methodology".

The third question asks: Within the same market and for stories ascertained to be about the same topic, will the pattern of treatment shown by newspaper-combined stations be different from the pattern shown by non-newspaper-combined stations? This question stipulates first, the identification of stories which are about the same subject and are presented by both the newspaper-combined outlet and the non-newspaper-combined outlet. It then requires judgments to be made concerning the attitudes expressed by each writer toward the common subject matter.

The fourth question is formulated as: Within the same markets, will the news service provided by newspaper-allied stations be different from the service provided by non-newspaper-allied stations? The requirements of this question are first, measures of the service provided and second, a comparison of the scores of the two broadcast group over these measures. The technical procedures used to fulfill the requirements for answers to these questions follow immediately.

METHODOLOGY

The first requirement of the methodology was to provide a system to compare each story from one source with each story from all the other sources. The physical logistics of handling up to seven separate sources, each with a score or more stories, precluded direct comparison. As a result, a process called key word comparison was developed. Simply stated it required an individual to read a story and determine the key words which described the major topic areas in the story. Key words were defined as persons, things, organizations, concepts, ideologies, political entities, actions, and so on which produce some effect or are the object of some activity, statement, discussions, or description that occupies a significant portion of the content of a news story. The last phrase of the definition "occupies a significant portion of the content of a news story" was left undefined. Definition of the word significance was a judgmental act. Since judgments can sometimes be unique to the individual, a team of four raters was used to select the key words from each story. Only those key words identified by two of the four raters were used in subsequent analyses.

The second requirement of the methodology was to provide measures of treatment. Two scores were devised for this purpose. They were the key word rating score and the story rating score. In the key word rating score, judges were instructed to evaluate the attitudes expressed in the news story by the writer toward the key word. Key word rating scores were numerical values from 1-7 which indicated the direction and intensity of the evaluative treatment of the key word. The primary polar interpretations were positive (1) and negative (7). Other polar interpretations allowable were tasteful – distasteful; clean – dirty; pleasant – unpleasant; beautiful – ugly;

fragrant – foul. The words used to describe the seven intervals were: a) 1 or 7; extremely, perfectly, completely, maximally, remarkable, definitely; b) 2 or 6: quite, considerably, fairly, reasonably, ordinarily, normally; c) 3 or 5; slightly, barely, minimally, a little, a bit, somewhat; d) 4 neutral. Raters were instructed to first select the direction assigned to the key word – positive, negative, or neutral. Direction was to be determined by the adjectives and adverbs used to describe the key word. It could also be determined by the association of the key word with some positive or negative action which the key word undertakes or is responsible for. In determining direction, only meanings common to most users of American English were utilized.

Once direction was established the next step was to determine the location on the intensity scale. Some nouns implied their own intensity measure. "Fair play" seems quite favorable. "Atrocities" is very negative. However, in most cases intensity was determined by the modifiers both adjectives and adverbs. Intensity as with direction was based on the common usage of words.

The story score was developed in precisely the same way as the key word rating score. However, the object of evaluation shifted from the key words to the total story. The purpose of this score was to be sensitive to balance in presentations. With a mixture of key word evaluative treatments, the overall treatment effect of a story might be quite different from the treatment effect of a single key word. The story score provided an indication of this effect.

Demographic information about the story was also recorded. These data included market of presentation, rank of that market, medium of presentation, ownership

of that medium; position of the story, length of the story and source of the story (local, AP wire, etc.).

All markets in which there was a newspaper-television-radio combination that had television and radio competition from non-newspaper and separately owned outlets were used in this study.[1] The newspaper-allied television-radio combination was matched with a randomly selected television-radio combination whose components were not allied with a newspaper and had no corporate connections. The two combinations were composed of equivalent services. That is a TV-AM-FM combination was matched with a TV-AM-FM combination; a TV-AM with a TV-AM and a TV-FM with a TV-FM. When choice was possible the non-newspaper-allied combinations were randomly selected under the following parameters: a) AM stations should be licensed for fulltime operation; b) TV stations where possible should operate on the same band; c) the TV, AM, and FM stations selected had to provide primary service to the same markets as the newspaper combinations. The purpose of the random sample technique was to reduce the available data to manageable size and to provide data free from the biases inherent in any matched sample technique. Entities can differ one from another on an infinite number of variables. A matching procedure uses some limited number of these variables to proclaim any set equivalent. The dangers that the matching procedure will systematically interact with the data collected are substantial. The random selection procedure is the only procedure which *can* be unbiased.

[1]New York and Boston were two exceptions. Both markets were deleted because they were the site of other litigation which have affected the market news coverage.

Scripts from the "prime evening newscast" were solicited from each of the stations for the Monday, Wednesday, and Friday of an arbitrarily selected week. For approximately one-third of the sample, the week of November 16th was used; for the second third, the week of December 7th; for the final third, the week of January 18th. The weeks selected were determined by the schedule allotted to the study and by the requirement that the time selected should be close to but preceding the receipt of the requesting letter. Three scripts were selected to provide an adequate analytical base. All hard news, and human interest items were used as the basis for analysis. Sports, financial summaries, and weather items except where they were also hard news were not included. Each station was requested to mark the end of each story and to identify its source. Appendix A gives a copy of the requesting letter.

Story selection, key word selection, key word ratings, and story ratings were done by a team of four raters. In order to ensure that comparable stations would receive the same analysis, three teams of raters were used; one for each of the broadcast media. The FM team did double duty by also rating the newspapers. Stations were coded by a number whose meaning was known only to the primary research team. However, no other secrecy measures were taken. Each rater worked independently to select those stories which were hard news or human interest items, to select the key words for those stories, and to rate the key words and the stories themselves. Stories selected by any two raters were rated by all. Work sheets from the rating teams were processed by a checker to ensure that each qualifying story was rated and appropriately labeled. The checker also removed any minor discrepancies in the key words among the raters.

These discrepancies were such things as spelling, inclusion of prepositions, punctuation, minor adjectives, and so forth. The data were then key-punched and verified. Additionally, the data cards were checked by computer to ensure that they were in the proper order, that the data were in their proper fields, and that scores were within the scale limits. This "error scan" program was run again with all cards immediately prior to the calculation phase of this study.

The key words, key word ratings, and the story ratings for each story generated by each rating team were then reconciled by computer to provide a single set of data. Appendix B provides a description of the procedures used. Key words retained for a story were those listed by three of the four raters. Key word ratings were the mean scores from the selecting raters. Story ratings were the mean scores from all members of the team.

The questions of interest reported above evoked a series of specific research hypotheses. These were:

1) Newspaper-allied television outlets will evidence greater topic correspondence with the allied newspaper than separately owned television stations will show with the newspaper.
2) Newspaper-allied television outlets will evidence greater story treatment correspondence with the allied newspaper than separately owned television stations will show with that newspaper.
3) Newspaper-allied television outlets will evidence greater key word treatment correspondence with the allied newspaper than separately owned television stations will show with that newspaper.
4) Newspaper-allied radio stations will show greater topic correspondence with the allied newspaper than separately owned radio stations will show with that newspaper.

5) Newspaper-allied radio stations will show greater story treatment correspondence with the allied newspaper than separately owned radio stations will show with that newspaper.
6) Newspaper-allied radio stations will show greater key word correspondence with the allied newspaper than separately owned radio stations will show with that newspaper.
7) Newspaper-allied television and radio combinations will evidence greater topic correspondence than equivalent non-newspaper, separately owned television and radio combinations.
8) Newspaper-allied television and radio combinations will evidence greater story treatment than equivalent non-newspaper, separately owned television and radio combinations.
9) Newspaper-allied television and radio combinations will evidence greater key word treatment correspondence than equivalent non-newspaper, separately owned television and radio combinations.
10) For the same story newspaper-allied television stations will evidence a different pattern of story treatment scores than the pattern evidenced by non-newspaper-allied television stations.
11) For the same key words within the same story newspaper-allied television stations will evidence a different pattern of key word scores than the pattern evidenced by non-newspaper-allied television stations.
12) For the same story newspaper-allied radio stations will evidence a different pattern of story treatment scores than the pattern evidenced by non-newspaper allied radio stations.
13) For the same key words within the same story newspaper-allied radio stations will evidence a different pattern of key word scores than the pattern evidenced by non-newspaper-allied radio stations.

14) Newspaper-allied television stations will show less topic diversity than non-newspaper-allied television stations.

15) Newspaper-allied radio stations will show less topic diversity than non-newspaper-allied radio stations.

16) Newspaper allied television stations will report fewer stories than non-newspaper-allied television stations.

17) Newspaper-allied radio stations will report fewer stories than non-newspaper-allied television stations.

18) Newspaper-allied television stations will use fewer sources than non-newspaper-allied television stations.

19) Newspaper-allied radio stations will use fewer sources than non-newspaper-allied radio stations.

20) Newspaper-allied television stations will present fewer stories written by the local station staff than non-newspaper-allied television stations.

21) Newspaper allied radio stations will present fewer stories written by the local station staff than non-newspaper-allied radio stations.

The first six hypotheses provide the answers for questions one and two. To test these hypotheses three correspondence scores were developed. The first taking each broadcast outlet in turn compared each story from the broadcast outlet with each story from the broadcast-allied newspaper. The comparison was conducted for each news day. Within a given comparison if one or more of the key words agreed, the stories were deemed equivalent or common. The story correspondence score was calculated from the ratio of the number of common stories over the larger number of stories in the pair.

The second score determined the correspondence between the story scores given to the same (common) story by the two outlets. Only stories determined to be common in the text above were used. The story rating correspondence score was the ratio of the number of common story *ratings* over the number of common *stories*. In testing for commonality of rating, the rating scores were truncated to a three value scale with 1 being positive; 2 being neutral; and 3 being negative. The purpose of this truncation was to avoid trivial differences being counted as substantial.

The third score measured the correspondence between the ratings for common key words within the same story that were common to both outlets. Again only stories meeting the first test were used. Key words were said to be common if 90 per cent of the letters in sequence agreed precisely. The key word rating correspondence score for media was calculated as the ratio of the number of common key words with the same rating over the number of common key words. The truncation used with the story ratings was used again with the key words.

These three measures were developed for both the newspaper and non-newspaper-allied broadcast stations. As suggested previously the analysis of newspapers required the formulation of some special rules. The rules, described in Appendix C, controlled the selection of specific pages which were used in the analysis. Essentially the pages were the front page and the "prime local news" page. Stories including those continued on other pages were rated in their entirety. Each of the measures was submitted to a repeated measures analysis of the variance design with each market/newsday being treated as a subject. The rationale for using the market/newsday as a subject is that each newsday provides the source of news items for all news media. Any given news medium is reflecting in its news presentations the way it evaluates the the events of the day. By comparing news media over a given day, one can determine similarities and differences in these evaluations.

In order to avoid the problems of interpretation of the appearance of "no significant differences" or the appearance of trivial but significant differences, correlation analysis was also conducted over these data. For our hypotheses to be completely supported, significant differences should appear in the analysis of variance and there should be no significant positive correlation.

The next three hypotheses (6-9) do not refer to any of the questions. They are included as topics of interest and a logical extension of the methodology used. For these hypotheses the measures and analyses described above were used with each of the broadcast media combinations and each of the ownership groups.

Question three was investigated by hypotheses 10 thru 13. Treatment patterns are complex and difficult to identify. In terms of the measuring instruments used here, differences in these patterns can be of three types. First the evaluations of each story or of each key word by the two stations could be of the same intensity but in the opposite direction. Second the evaluations could be in the same direction but of different intensities. Third the differences could be a combination of intensity and direction. Since each evaluation was tied to specific content, the likelihood of an owernship difference consistent in direction or in intensity or both was exceedingly small. Individual statistical tests require consistency in one of these areas for power. As a result no single statistical procedure was adequate to test for the possibility of systematic ownership effects. The following set of procedures was used over the treatment scores for matching (common) stories and matching key words within common stories.

To determine the internal stability of the story ratings and the key word scores the means and variance were

calculated on two transformations of these measures. The first transformation was the algebraic sum of the sum of the score minus the constant 4. That is (X-4). The second was the absolute sum of the score minus the constant 4. That is /X-4/. If the scores were stable at the neutral point, one would expect the means of both transformations to be 0 and the variance to be small. If, however, the scores tended to switch back and forth in direction but not intensity, then one would expect the mean of the first transformation to be 0, the mean of the second transformation to be something other than 0 and the variances to be relatively large. If the scores varied in the intensity but not direction then one would expect both means to be something other than 0 and the variances to be moderate to large.

To test for significance of any difference the following procedures were used: To test for a consistent difference in direction, the raw scores were correlated. A direction difference would result in a negative correlation. To test for differences in intensity the score from the non-newspaper-allied outlet was subtracted from the score from the newspaper-allied outlet. The algebraic sum of this transformation (X-Y) was used to test whether the obtained mean differed from the predicted mean of zero. To test for the combination the absolute sum of the above transformation was used. That is /X-Y/. Again the obtained difference was tested against the expected difference of zero.

Only a combination of tests such as these would be sensitive to the varying patterns of difference that could occur.

Hypotheses 14-21 provide insight into the answer of question four. For hypothesis 14 each story from the newspaper-allied television outlet was compared with

each story from the non-newspaper-allied television station. Stories were determined to be common or different according to the test described above. A topic diversity score was calculated for each station by taking the ratio of the number of different stories over the total number of stories presented by that station. In the same manner hypothesis 15 was tested except that the radio stations were used. In both instances the data were analyzed by analysis of variance and correlation analysis.

In hypothesis 16 the number of stories presented on each day by each of the newspaper-allied television stations was compared by means of analysis of variance with the number of stories presented by non-newspaper-allied television stations. Hypothesis 17 used the same procedures with the radio stations.

Hypotheses 18 and 19 were tested in the same manner as 16 and 17 using the number of different sources appearing in a newsday as the datum.

Hypotheses 20 and 21 were tested by determining the proportion of stories which were locally written. The score was the number of locally written stories for each newsday over the total number of stories for that newsday. Analysis of variance was conducted over these data.

In all tests the .05 level of significance was used. All data were analyzed using the Ohio University computer facilities. The Ohio University Computer Center operates an IBM Model 360/44 with appropriate options. Data handling programs were developed by the Broadcast Research Center and, as noted, as described in Appendix B.

RESULTS AND DISCUSSION

Table 1 presents the markets in which a newspaper or broadcast station returned data for this study. In all 36 newspapers, 85 television stations, and 92 radio stations from 49 markets responded. A total of 720 scripts and papers were received and analyzed.[1]

The percentage of return to the requesting letter varied widely among the media and ownership groups. For the newspaper-owned stations 96 per cent return was obtained for television; 73 per cent for radio. For the non-newspaper-owned stations, 78 per cent return was obtained for television; 37 per cent for radio. Seventy-four per cent of the newspapers contacted responded.

The major discrepancy in return was with the non-newspaper-owned radio stations. Three reasons substantially accounted for their failure to return. The first was that the station did not retain scripts after broadcast. The second was that the station actively refused to comply with the request. The third, the station did not respond to the letter and three attempts to make contact by telephone failed. Of the reasons, the first applied to about half of the return failures; the remaining two about equally accounted for the other half. Nearly all of the failures to return for the other broadcast categories were accounted for by the lack of scripts. The primary problem in obtaining the newspapers was the necessity of having the physical paper itself. Some newspapers do not retain back copies; others had run out of the particular days requested; and still others, operating under a 30 day rotation, had disposed of the back copies needed.[2]

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[1]The scope of the study is best described in physical terms. Over 7000 stories generating over 21,000 key words were recorded on 52,000 data cards.

[2]The decision to analyze newspapers came several weeks after the initial station selection.

TABLE 1

	Newspaper Owned				Non-Newspaper Owned		
Top 50 Markets	AM	FM	TV	Newspaper	AM	FM	TV
Atlanta, Ga.	x		x	x			
Baltimore, Md.	x	x	x				
Birmingham, Ala.	x	x	x				
Buffalo, N.Y.	x	x	x	x		x	x
Chicago, Ill.	x		x	x			x
Columbus, Ohio	x	x	x	x			x
Dallas, Texas	x	x	x	x		x	x
Dayton, Ohio	x	x	x		x	x	x
Detroit, Mich.	x	x	x	x	x	x	x
Ft. Worth, Texas	x	x	x	x	x		
Greenville, S.C.		x	x		x		x
Houston, Texas	x		x	x			
Lancaster, Pa.	x	x	x	z	x		x
Louisville, Ky.	x	x	x	x	x		x
Memphis, Tenn.	x	x	x	x		x	x
Milwaukee, Wis.	x	x	x	x			x
Minneapolis, Minn.	x	x	x	x			x
Norfolk, Va.			x				x
Oklahoma City, Okla.			x	x			x
Philadelphia, Pa.	x	x	x	x	x		x
Portland, Oregon			x	x	x	x	x
Sacramento, Calif.	x		x				x
Salt Lake City, Utah	x	x	x		x		x
St. Louis, Mo.	x		x	x	x		
Syracuse, N.Y.	x		x	x			
Tampa, Florida	x		x	x			x
Washington, D.C.	x	x	x	x	x	x	x

	Newspaper Owned			Non-Newspaper Owned			
51 and below	AM	FM	TV	Newspaper	AM	FM	TV
Baton Rouge, La.	x		x	x	x		x
Binghampton, N.Y.	x		x	x	x		
Boise, Idaho	x	x	x	x			x
Cedar Rapids, Iowa	x		x	x			x
Columbus, Ga.	x	x	x	x			x
Des Moines, Iowa	x	x	x				x
Duluth, Minn.			x	x	x		x
Fargo, N.D.	x			x	x		x
Ft. Smith, Ark.			x				
Fresno, Calif.	x		x	x	x		x
Jackson, Miss.			x	x			x
Las Vegas, Nev.			x	x			x
Meridian, Miss.			x				
Reno, Nevada							x
Rochester, N.Y.	x		x	x			x
Rock Island, Ill.	x		x	x	x	x	x
South Bend, Ind.	x	x	x	x	x		x
Spokane, Wash.	x		x	x			x
Springfield, Mo.	x		x	x	x		x
Topeka, Kan.	x	x	x		x		
Wausau, Wis.	x	x	x			x	
Youngstown, Ohio	x		x	x	x		x

Table 1 – Markets from which data was obtained

The results from the statistical analysis are presented below in the order of the hypotheses. For the reader's convenience, the analysis of variance summary tables are reported in Appendix C.

Hypothesis 1) Newspaper-allied television outlets will evidence greater topic correspondence with the allied newspaper than separately owned television stations will show with that newspaper.

Each market where there was a newspaper-allied and a non-newspaper-allied television station and the appropriate newspaper was available was used in a repeated measures analysis of variance. As described above each story from the televised local newscast was compared with each story from the selected pages of the newspaper. Only those station/newspaper combinations which matched by market and newsday were used. In the analysis of variance the market/newsday was used as the subject, and the newspaper group correspondence score were used as the repeated measures. In order to be sensitive to difference in market types the markets were divided into those in the top fifty category by size and those fifty-one and below. The classifications given by Seiden (1971) were used in this study. The resulting analysis was a Linquist (1953) Type I design with the correspondence scores as the within measure the market designations as the between measure and the market/newsdays as the subjects. This design was used in all of the correspondence scores.

No significant interaction of main effects was found in this analysis. Table 2 presents the mean scores for each cell and the F-ratios for each of the tests.
As can be seen from Table 2 in terms of absolute numbers the non-newspaper-allied television stations show greater correspondence with the market newspaper. In interpreting the correspondence score the reader should remember that it represents the correspondence between the broadcast stories and a sample of stories in the newspaper. The correspondence score would be higher if all

TABLE 2

Ownership	Market Size		F-Ratios and Degrees of Freedom		
	1-50	51+	Interaction	Ownership	Market
Newspaper	.08	.07	0.03	1.64	0.61
Non-Newspaper	.10	.09	1,77	1.77	1.77

Table 2 – Mean topic correspondence scores and F-ratios for television by newspaper comparisons

the pages were analyzed. The fact that a sample of the newspaper was used does not affect the comparison between the ownership groups. If one group systematically shows a higher correspondence, this correspondence should appear when using a sample. In order to provide additional information as to the similarity of the two sets of correspondence scores, correlation analysis was conducted. The correlation between the correspondence scores from two ownership types was .34 (df=77) and significant.

The consistently greater correspondence between newspaper-allied television stations and that newspaper which this hypothesis predicted did not appear. Within the markets tested newspaper-allied and non-newspaper-allied television stations show similar degrees of correspondence with the market newspaper over topics selected for presentation.

Hypothesis 2) Newspaper-allied television outlets will evidence greater story treatment correspondence with the allied newspaper than separately owned television stations will show with that newspaper.

The story scores representing the evaluated attitudes expressed in the story by the newswriter were compared

within each newspaper/television combination over commonly were treated in the sam e manner. The Type I analysis of variance comparing the newspaper and non-newspaper groups showed no significant effects. Table 3 presents the mean scores for each cell and the F-ratios for each test. Again in absolute terms the non-newspaper television stations show greater correspondence with the newspaper than the newspaper groups. This effect while not significant shows some strength ($p.<20$). The correlation between the two correspondence scores was (df=77) and significant.

TABLE 3

Ownership	Market Size		F-Ratios and Degrees of Freedom		
	1-50	51+	Interaction	Ownership	Market
Newspaper	.45	.38	0.01	2.38	0.81
Non-Newspaper	.54	.46	1,77	1,77	1,77

Table 3 – Mean story correspondence scores and F-ratios for television by newspaper comparisons.

Ownership patterns, then, show no relationship to the degree of agreement between newspapers and television stations allied with those newspapers and not allied with them over the evaluative treatment of stories presented in common. In fact the different ownership patterns show significantly similar degrees of agreement. Consequently no support is found for the second hypothesis.

Hypothesis 3) Newspaper-allied television outlets will evidence greater key word treatment correspondence with the allied newspaper than separately owned television stations will show that newspaper.

The third hypothesis concerns itself with the degree of agreement between television stations and newspapers over individual themes in common. It tests whether connections with a newspaper increases the degree of agreement in the evaluative treatment of common themes The Type I analysis of variance used to test this hypothesis indicated no significant interactions but significant main effects of ownership and market size. Table 4 presents the mean scores and F-ratios for each of these tests.

TABLE 4

Ownership	Market Size		F-Ratios and Degrees of Freedom		
	1-50	51+	Interaction	Ownership	Market
Newspaper	.41	.21	0.36	8.44*	4.80*
Non-Newspaper	.55	.41	1,77	1,77	1,77

*Significant at the .05 level.

Table 4 – Mean key word correspondence scores and F-ratios for television by newspaper comparisons.

Table 4 shows that non-newspaper-allied television stations generate significantly *higher* correspondence with the broadcast allied newspaper than the newspaper-allied television stations. It also shows that the correspondence is higher generally in the top fifty markets than in the markets fifty-one and below. The results from the three hypotheses taken together suggest a greater commonality of source between the non-newspaper television station and the broadcast allied newspaper. This commonality would explain the greater degree of agreement shown with such combinations over topics presented, attitudes expressed toward those topics

and attitudes expressed toward individual themes presented within a story. Support is found for this rationale in later analyses which show a higher proportion of the stories presented by non-newspaper allied television stations being written by outside sources. Since many of these same sources write for newspapers, commonality of topic and treatment would be explained.

Most certainly the results from the tests of the three hypotheses provide no support for the position that alliances between television stations and newspapers will systematically result in a monolithic presentation of information. There is even some indication that newspaper-allied television stations vary from the newspaper in their presentations to a greater extent than non-newspaper-allied stations.

The next set of three hypotheses present an investigation of the degree of correspondence between radio and newspaper combinations. The approach is exactly the same as used for television/newspaper combinations.

Hypothesis 4) Newspaper-allied radio stations will show greater topic correspondence with the allied newspaper than separately owned radio stations will show with that newspaper.

Each market in which there was a newspaper-allied radio station and non-newspaper-allied radio station and an available newspaper was used to test this hypothesis. The topic correspondence score was constructed as above by comparing each story from each radio station with stories printed by the market newspaper on the selected pages. The correspondence scores were used as the within measure, the market categories as the between measure and the market/newsdays as the subjects in a Type I analysis of variance. No significant effects were

found in the comparison of the ownership groups. Table 5 presents the mean scores for each cell and the F-ratios for each test. The reader is once more cautioned in interpreting the correspondence score as restricted to the pages selected.

TABLE 5

Ownership	Market Size		F-Ratios and Degrees of Freedom		
	1-50	51+	Interaction	Ownership	Market
Newspaper	.07	.09	1.70	1.26	0.34
Non-Newspaper	.07	.06	1,51	1,51	1,51

Table 5 – Mean topic correspondence scores and F-ratios for radio by newspaper comparisons.

Table 5 reveals that the two types of radio stations show exactly the same correspondence mean score in the top fifty market category. Newspaper-allied stations show slightly higher correspondence in the fifty-one and below category. The correlation coefficient between the two sets of correspondence score was .40 and significant.

These results largely repeat the results found with the television/newspaper combinations. The likelihood then is that newspaper and non-newspaper-allied radio stations show similar degrees of agreement with the broadcast allied newspaper.

Hypothesis 5) Newspaper-allied radio stations will show greater story treatment correspondence with the allied newspaper than separately owned radio stations will show with that newspaper.

The degree of agreement between radio news stories and newspaper stories was not different over ownership groups and/or market categories. In the Type I analysis

of variance no significant effects were found. Table 6 gives the mean scores and F-ratios for each test. The means evidence a slightly higher correspondence for non-newspaper-allied stations again repeating the television results. The correlation coefficient was .14 (df=51) and not significant. These results signify that differences from market to market account for any differences in scores.

TABLE 6

Ownership	Market Size		F-Ratios and Degrees of Freedom		
	1-50	51+	Interaction	Ownership	Market
Newspaper	.33	.40	0.01	0.22	0.55
Non-Newspaper	.38	.44	1,51	1,51	1,51

Table 6 – Mean story correspondence scores and F-ratios for radio by newspaper comparisons.

Hypothesis 6) Newspaper-allied radio stations will show greater key word correspondence with the allied newspaper than separately owned radio stations will show with that newspaper.

The final correspondence analysis in this set once more showed no significant effects for the two ownership groups and the two market categories and no significant correlation (.08; df=51) between the two sets of scores. Table 7 discloses the mean scores and the F-ratios from the Type I analysis of variance. In the top fifty category non-newspaper radio stations show higher correspondence with the broadcast allied newspaper. This results is reversed in the fifty-one and below category. Overall the non-newspaper stations score higher which repeats the result found in the television analysis.

TABLE 7

Ownership	Market Size		F-Ratios and Degrees of Freedom		
	1-50	51+	Interaction	Ownership	Market
Newspaper	.29	.35	2.14	0.22	0.41
Non-Newspaper	.42	.25	1,51	1,51	1,51

Table 7 – Mean key word correspondence scores and F-ratios for radio by newspaper comparisons.

The consistent failure to find support for the radio/newspaper correspondence hypotheses and the consistent repetition of the television findings lead us to the conclusion that radio news broadcasts are not systematically influenced in terms of topics presented and attitudes expressed by different ownership patterns. The potential for information control inherent in cross-media alliances appears to be adequately controlled by forces in the market-place.

The next set of hypotheses tested the correspondence between commonly owned television and radio stations and separately owned television and radio stations. These tests, while not centrally related to the issue of cross-media ownership, are a natural extension of the methodology employed in this study. In addition they provide an examination of the methodology under conditions where one group - the commonly owned group – is known to show greater correspondence than the other. We would expect, then, that the commonly owned group would show higher correspondence generally. The extent of this correspondence is unknown although some have predicted it to be quite high. The procedure used to test these hypotheses is the same procedure used in the newspaper comparisons above.

Hypothesis 7) Newspaper-allied television and radio combination will evidence greater topic correspondence than equivalent non-newspaper, separately owned television and radio combinations.

The type I analysis of variance conducted over the topic correspondence scores produced a significant interaction (F=6.86; df=1, 51). Consequently, the Type I design was broken into its simple components. Treatment by subject analyses were run over the correspondence scores from the two ownership groups within each market category and simple random analyses were calculated over the two market categories for each ownership type. Table 8 exhibits the mean score for each market ownership/combination and the F-ratios from each of the component designs.

As predicted the commonly owned stations do show greater correspondence than the separately owned stations. In the top fifty markets this correspondence is still

TABLE 8

Ownership	Market Size		F-Ratios and Degrees of Freedom
	1-50	51+	
Newspaper	.22	.44	12.96*; 1.51
Non-Newspaper	.11	.14	1.36; 1,51
F-ratio	15.06*	12.58*	
and df	1,34	1,17	

*Significant at the .05 level.

Table 8 – Mean topic correspondence scores and F-ratios from component tests for radio by television comparisons.

quite low. Almost 80 per cent of the local stories did not correspond in topic. In the fifty-one and below category the correspondence jumps dramatically, perhaps reflecting the need for more efficient use of new facilities in the smaller markets. This higher correspondence calls for additional research in the form of a case-by-case investigation to determine the source(s) and effects.

Hypothesis 8) Newspaper-allied television and radio combinations will evidence greater story treatment correspondence than equivalent non-newspaper owned television and radio combinations.

The story scores were subjected to the now familiar analytical scheme. The interaction among ownership groups, market categories, and correspondence scores was significant (F=6.39; df=1.51). The Type I design was therefore broken into its components. Table 9 displays the mean scores for each cell and the F-ratios for the

TABLE 9

Ownership	Market Size		F-Ratios and Degrees of Freedom
	1-50	51+	
Newspaper	.72	.70	0.01; 1,51
Non-Newspaper	.66	.29	13.17*; 1,51
F-Ratios	0.51	16.16*	
and df	1,34	1,17	

*Significant at the .05 level.

Table 9 – Mean story correspondence scores and F-ratios from component tests for radio by television comparisons.

subsequent tests. The table shows that the source of the interaction was very low correspondence between separately owned television and radio stations in the fifty-one and below market category.

This correspondence was significantly lower than the correspondence found for the same ownership group in the top fifty markets and significantly lower than the correspondence found for the commonly owned stations in fifty-one and below category.

The other effects were not significant. On the basis of the analyses conducted for this study, this researcher is at a loss to explain the very low correspondence found. Examination of the raw data gives some indication that separately owned broadcast stations in smaller markets express attitudes of some variance rather than clustering quite closely to the neutral position. Specific tests need to be conducted to verify that indication however.

Hypothesis 9) Newspaper-allied television and radio combinations will evidence greater key word treatment correspondence than equivalent non-newspaper separately owned television and radio combinations.

The last correspondence analysis tested the degree of agreement in attitudes about common themes presented by each ownership combinations. The interaction in the Type I design was again significant (F=5; df=1,51) and the subsequent tests were run. The mean scores for each cell and the results for the component tests are presented in Table 10. The key word results replicate the results found with the story scores. Table 10 reveals that only the mean score for the separately owned combinations in the fifty-one and below market categories produced significant differences. It was significantly lower than the comparable scores across ownership and very close to

significance across market size. Again this interesting result. It occurs to this researcher that the small market, independently-owned station may be an exceedingly fruitful unit of analysis in subsequent research.

TABLE 10

Ownership	Market Size		F-Ratios and Degrees of Freedom
	1-50	51+	
Newspaper	.69	.77	0.78; 1,51
Non-Newspaper	.67	.45	3.91; 1,51
F-Ratios and df	0.05 1,34	8.46* 1,17	

*Significant at the .05 level.

Table 10 – Mean key word correspondence scores and F-ratios from component tests for radio by television comparisons.

The results from this set of hypotheses indicate strong evidence for the retention of the first and some evidence for the retention of the remaining two. Certainly retention of all three is called for in the smaller markets. At the same time in calling for the retention of these hypotheses we also call for research into the specific effects that the correspondence identified here has on the information market.

The next set of hypotheses dealt with the possibility of different patterns of evaluative treatment by broadcast stations operating under different ownership. The results from these tests follow in order:

Hypothesis 10) For the same story newspaper-allied television stations will evidence a different pattern

of story treatment scores than the pattern evidenced by non-newspaper-allied television stations.

Table 11 presents the mean scores and standards deviations for the raw story scores (X) the algebraic difference of the score from the neutral point (X-4) and the absolute difference from the neutral point (/X-4/) for stories from newspaper-allied and non-newspaper-allied television stations.

TABLE 11

	Newspaper			Non-Newspaper		
	(X)	(X-4)	X-4	(X)	(X-4)	X-4
Means	4.013	.013	.279	4.076	.076	.302
Standard Dev.	.421	.421	.316	.444	.444	.333
t-tests (df=190)	—	.427	12.237*	—	2.372*	12.567*

*Significant at the .05 level.

Table 11 – Means and standard deviations and t-tests for television story scores by ownership.

The t-tests reported in Table 11 indicated that all means except the algebraic transformation for the newspaper group were significantly different from zero. In reference to the logical analysis presented under "Methodology" above, these results indicate that the story scores for both ownership groups do vary slightly but significantly from the neutral point and for the non-newspaper group the story scores do so more toward the negative side.[2]

The next step in the test of this hypothesis was the calculation of the correlation between the newspaper-

[2]The reader is reminded that the attitude scale ran from 1 (positive) to 7 (negative). Values larger than 4 indicate negative attitudes.

allied station's raw score with its non-newspaper/ counterpart. The coefficient was .39 (df=190) which is moderate strength and significance. Based on our arguments above we infer some consistency of direction.

Finally we are required to test the mean algebraic difference /X-Y/ between the newspaper score and the non-newspaper score. These means were -.063 and .323 respectively. The *t*-tests showed the mean of (X-Y) not to be significantly different from zero (t=1.82; df=190) but the mean of /X-Y/ to be significantly different from zero (t=12.42; df=190). Consequently we infer that newspaper-owned presentations and non-newspaper-owned presentations vary in the same direction (see correlation above) but differ significantly in intensity. A review of all the data, then, indicates that non-newspaper stations are slightly more negative and slightly more intense in the attitudes expressed in common stories.

Hypothesis 11) For the same story newspaper-owned radio stations will evidence a different pattern of story treatment scores than the pattern evidenced by non-newspaper-owned radio stations.

The analysis of the radio story scores followed the same pattern as the analysis of the television story scores. Table 12 presents the means, standard deviations, and for the raw scores and transformed scores from newspaper and non-newspaper-owned radio news broadcasts. All *t*-tests showed the means deviating significantly from zero. These tests indicated that the scores tended to switch back and forth around the zero point but, on the whole were slightly more negative than positive.

As required the correlation coefficient was calculated. The obtained coefficient was .44 (df=321) which is significant. The direction of the two scores tended to be fairly similar.

Finally the *t*-tests were conducted on the mean algebraic (.016) and mean absolute difference (.288) between the ownership groups. The first test (t=.66; df=321) was not significant. The second (t=16.231; df=321) was. These two results show that the newspaper-owned radio stories follow the direction of the non-newspaper-owned stories but differ significantly in intensity. Again non-newspaper-allied radio stories tend to express slightly more intense attitudes.

TABLE 12

	Newspaper			Non-Newspaper		
	(X)	(X-4)	X-4	(X)	(X-4)	X-4
Means	4.093	.093	.266	4.077	.077	.286
Standard Dev.	.390	.390	.300	.432	.432	.333
t-test (df=321)	—	4.285*	15.937*	—	3.204*	15.442*

*Significant at the .05 level.

Table 12 – Means, standard deviations, and *t*-tests for story scores from newspaper and non-newspaper-owned radio stations

Hypothesis 12) For the same key words within the same story newspaper-allied television stations will evidence a different pattern of key word scores than the pattern evidenced by non-newspaper-allied television stations.

Analysis of the patterns in key word evaluation followed the same form as the analysis of the story scores. Table 13 presents the means, standard deviations, and *t*-tests for the raw television key word scores and the two formations.

The television key word scores evidence much the same pattern as the television story scores. All means except the algebraic transformation for the newspaper group were significant. Both station groups tend to deviate from the neutral point, and with the non-newspaper groups being more toward the negative than the positive.

The correlation coefficient was calculated over the two sets of raw scores and was .52 (df= 291). This value is significant and substantiates a consistent relation in direction between the two groups.

TABLE 13

	Newspaper			Non-Newspaper		
	(X)	(X-4)	/X-4/	(X)	(X-4)	/X-4/
Means	4.024	.024	.232	4.100	.100	.253
Standard Dev.	.440	.440	.374	.457	.457	.394
t-tests (df=291)	—	.933	10.622*	—	3.746*	10.995*

*Significant at the .05 level.

Table 13 – Means, standard deviations, and *t*-tests for television key word scores.

The mean algebraic difference (0.076) and the mean absolute difference (.265) between the raw scores from the two groups were tested for deviation from zero. Both means were significantly greater than zero (t=2.950; df=291 and t=12.571; df=291 respectively). The results in the first case again indicate that the non-newspaper group was slightly but consistently more negative in their evaluations of the same key words than the newspaper group. The second case demonstrates that the variation was more extreme in both direction and intensity.

Hypothesis 13) For the same key words within the same story newspaper-allied radio stations will evidence a different pattern of key word scores than the pattern evidenced by non-newspaper-allied radio stations.

The final analyses in this set repeated the approach of the television key word scores. Table 14 presents the means, standard deviations, and *t*-tests for the raw radio key word scores and the two transformations.

The pattern evidenced here was precisely the pattern shown in the radio story scores. All means were significantly different from zero. The pattern again is for the scores to fluctuate around the neutral point but with more of them being negative. The significant correlation coefficient of .52 (df=418) indicates agreement in direction between the two groups.

TABLE 14

	Newspaper			Non-Newspaper		
	(X)	(X-4)	/X-4/	(X)	(X-4)	/X-4/
Means	4.127	.127	.260	4.123	.123	.261
Standard Dev.	.427	.427	.363	.447	.447	.383
t-tests (df=418)	—	6.312*	15.195*	—	5.837*	14.459*

*Significant at the .05 level.

Table 14 – Means, standard deviations, and *t*-tests for radio key word scores.

Finally the mean algebraic difference (.004) and mean absolute difference (.259) were tested. The deviation from zero of the first was not significant (t=.197; df=448). The second was (t=16.027; df=448). Once more newspaper-

owned stations follow closely the direction of non-newspaper evaluations but are separated in intensity with the non-newspaper stations expressing more intense attitudes.

Overall the pattern of evaluations was consistent regardless of the medium or score. Stories and key words from both station groups tend to deviate around the neutral point but more of the deviations were toward the negative side. Considering the subject matter of most news stories this result is verified in common sense. Differences did occur between the ownership groups primarily in intensity but also in direction for television. Inspection of the mean scores showed these differences to be quite small.

The next set of hypotheses tested the topic diversity presented by television and radio stations by the two groups. In both cases markets having matching stations are used in repeated measures designs. Correlation analysis was also conducted.

Hypothesis 14) Newspaper-allied television stations will show less topic diversity than non-newspaper-allied television stations.

The topic diversity score, calculated for each station for each newsday by taking the ratio of the number of different stories over the total number of stories presented by that station, provided a measure of the scope of news presentations in terms of the number of different topic treated. For this hypothesis, a Type I analysis of variance was run over those scores from each market where there was a matched newspaper-allied and non-newspaper-allied television station. The scores served as the within variable, the market categories as the between and the market/newsdays as the subjects in the design.

No significant effects were found in this analysis. Table 15 displays the diversity score means for each cell and the F-ratios for the tests conducted.

TABLE 15

Ownership	Market Size		F-Ratios and Degrees of Freedom		
	1-50	51+	Interaction	Ownership	Market
Newspaper	.74	.65	0.230	3.122	2.603
Non-Newspaper	.78	.72	1,59	1,59	1,59

Table 15 — Mean diversity scores and F-ratios for comparisons of matched television stations.

Examination of the table indicates that newspaper-allied television stations score slightly below non-newspaper-allied stations in diversity. The effect appears to be accounted for by later analyses which show that newspaper stations present slightly fewer stories; a result inturn accounted for by the fact that their stories are on the average longer than non-newspaper station stories.

The two sets of diversity scores were correlated and a significant coefficient of .39 (df=59) was obtained. The result of these analyses appears to be that the two sets of stations approximate one another in the scope of coverage fairly well.

Hypothesis 15) Newspaper-allied radio stations will show less topic diversity than non-newspaper-allied radio stations.

The television analytical scheme was used for the diversity scores. No significant effects were found between the two ownership groups and/or the two market categories. Table 16, which presents the means for each

cell and the F-ratios, indicates that the two ownership group means are virtually the same. The correlation between the two sets of scores resulted in a significant coefficient of .51 (df=122). The relationship between radio stations appears to be even closer than the relationship found for television stations.

TABLE 16

Ownership	Market Size		F-Ratios and Degrees of Freedom		
	1-50	51+	Interaction	Ownership	Market
Newspaper	.80	.76	0.208	0.173	2.578
Non-Newspaper	.80	.77	1,122	1,122	1,122

Table 16 — Mean diversity scores and F-ratios for comparisons of matched radio stations.

Consequently we can offer no support for the position that non-newspaper-allied broadcast stations provide a wider scope of news coverage for their markets.

Hypothesis 16) Newspaper-allied television stations will report fewer stories than non-newspaper-allied television stations.

All markets in which there were matched television stations were used in a Type I design to test this hypothesis. As is now familiar, the design had ownership groups as the within variable, market categories as the between and market/newsdays as the subjects. No significant effects were found. Table 17 gives the mean number of stories for each market ownership category and the F-ratios for the tests performed. The means for the two ownership groups are practically the same in the top fifty category. In the fifty-one and below category the

newspaper group mean is slightly lower than the non-newspaper group.

TABLE 17

Ownership	Market Size		F-Ratios and Degrees of Freedom		
	1-50	51+	Interaction	Ownership	Market
Newspaper	13.22	10.92	0.478	0.955	2,482
Non-Newspaper	13.94	12.92	1,59	1,59	1,59

Table 17 – Mean number of stories and F-ratios for comparisons of matched television stations.

The question of number of stories is also tied to the question of length of stories. Obviously in the same time period, if you present longer stories you must present fewer stories. To examine this possible confounding the average length of stories was used as the criterion measure in a Type I design as described above. Again no significant effects were found.

TABLE 18

Ownership	Market Size		F-Ratios and Degrees of Freedom		
	1-50	51+	Interaction	Ownership	Market
Newspaper	86.27	93.61	0.45	1.69	3.48
Non-Newspaper	82.67	86.95	1,59	1,59	1,59

Table 18 – Mean length of stories for each cell and F-ratios for comparison of matched television stations.

Inspection of Table 18 which presents the mean scores and F-ratios however, shows that the newspaper group generally presents longer stories and particularly so in the

smaller markets. This difference easily accounts for the slight differences in number of stories.

Hypothesis 17) Newspaper-allied radio stations will report fewer stories than non-newspaper-allied radio stations.

The approach used with television stations was replicated with the radio stations. Significant differences were found between the market categories. Radio stations in smaller markets generally present fewer news stories. No other effects were significant. Table 19 presents the mean number of stories presented by the two ownership groups in the two market categories. F-ratios for the tests conducted also appear.

TABLE 19

Ownership	Market Size		F-Ratios and Degrees of Freedom		
	1-50	51+	Interaction	Ownership	Market
Newspaper	13.54	11.39	0.07	0.03	5.31*
Non-Newspaper	13.59	11.83	1,122	1,122	1,122

*Significant at the .05 level.

Table 19 – Mean number of stories presented for each cell and F-ratios for comparisons of matched radio stations.

The average length of stories was also tested in radio. Significant market effects were found in the Type I design. Stations in smaller markets present significantly longer stories than stories presented by stations in the top fifty markets. Differences between stations of different ownership approached significance on this variable ($p. < .10$). Newspaper-allied stations present longer stories

regardless of market than non-newspaper stations. Table 20 displays the mean scores for each cell and the F-ratios for each test.

TABLE 20

Ownership	Market Size		F-Ratios and Degrees of Freedom		
	1-50	51+	Interaction	Ownership	Market
Newspaper	85.73	109.52	0.31	3.62	28.87*
Non-Newspaper	79.74	98.79	1,122	1,122	1,122

*Significant at .05 level.

Table 20 – Mean length of stories for each cell and F-ratios for comparisons of matched radio stations.

In sum two trends appear, one for each of the two variable utilized in these analyses. The first concerns market size and finds smaller markets presenting fewer but longer stories. The second concerns ownership and shows newspaper allied stations presenting fewer stories but longer stories with the length effect accentuated in the smaller markets.

Hypothesis 18) Newspaper-allied television stations will use fewer sources than non-newspaper-allied television stations.

The number of different sources was used as a criterion measure in a Type I design. Sources were provided by the reporting station for the broadcast scripts (see Appendix A). No significant effects were found in this analysis for television. According to the means presented in Table 21, approximately two attributable sources were used in the average television newscast regardless of ownership or market size.

TABLE 21

Ownership	Market Size		F-Ratios and Degrees of Freedom		
	1-50	51+	Interaction	Ownership	Market
Newspaper	2.29	2.37	1.16	0.61	0.35
Non-Newspaper	2.32	2.03	1, 59	1,59	1,59

Table 21 – Mean number of sources used for each cell and F-ratios for matched television stations.

Hypothesis 19) Newspaper-allied radio stations will use fewer sources than non-newspaper-allied radio stations.

No significant effects were found in the radio replication of the television analysis. Both ownership and market effects closely approached significance, however. The observed newspaper-allied stations used more sources in their news presentations. Both station sets in larger markets showed a greater number of sources being used. Table 22 furnishes the means and F-ratios from this analysis. It is quite possible that both occurrence

TABLE 22

Ownership	Market Size		F-Ratios and Degrees of Freedom		
	1-50	51+	Interaction	Ownership	Market
Newspaper	2.43	2.35	1.10	3.87	3.32
Non–Newspaper	2.30	1.96	1,122	1,122	1,122

Table 22 – Mean number of sources used for each cell and F-ratios for matched radio stations.

of larger numbers of sources are functions of economics. Group-owned radio stations and radio stations in larger markets are more likely to have the capability of subscribing to more news services.

Hypothesis 20) Newspaper-allied television stations will present fewer stories written by the local station staff than non-newspaper-allied television stations.

A major question of concern is the amount of local news which is written by the station staff. Relying entirely on outside sources has never been viewed as an adequate discharge of the broadcast news function. Consequently the proportion of stories which were locally written was used in a Type I analysis of variance. Significant ownership effects were found. Table 23 displays the the mean proportions for each cell and the F-ratios of the test run. The means show that newspaper-allied stations write significantly more of the stories presented than non-newspaper-allied stations. No other significant effects are shown.

TABLE 23

Ownership	Market Size		F-Ratios and Degrees of Freedom		
	1-50	51+	Interaction	Ownership	Market
Newspaper	.57	.60	0.01	7.60*	0.19
Non-Newspaper	.44	.47	1,59	1,59	1,59

*Significant at the .05 level.

Table 23 – Mean proportion of stories locally written for each cell and F-ratios for comparisons of matched television stations.

Hypothesis 21) Newspaper-allied radio stations will present fewer stories written by the local station staff than non-newspaper-allied radio stations.

The same analysis was conducted with the scores from radio stations and similar results were obtained. However, the ownership effect did not quite reach the accepted level of significance (p. <.10). Table 24 presents the means for each ownership group and each market category and the F-ratios for the Type I analysis.

TABLE 24

Ownership	Market Size		F-Ratios and Degrees of Freedom		
	1-50	51+	Interaction	Ownership	Market
Newspaper	.56	.57	1.19	3.77	0.92
Non-Newspaper	.47	.54	1,122	1,122	1,122

Table 24 – Mean proporation of stories locally written for each cell and F-ratios for comparisons of matched radio stations.

Looking at the results from both of these tests it appears as if newspaper-allied stations generally write more of the news they present. Non-newspaper-allied stations appear to rely more heavily on outside sources.

SUMMARY AND CONCLUSIONS

The purpose of this study was to determine whether the potential for information control inherent in cross-media combinations was being exercised in the market place. To do so, over 700 broadcast news scripts and newspapers from 49 markets were analyzed for the subject matter presented and for the attitudes expressed in them. On a market by market basis, two sets of compari-

sons were made. The first compared the degree of agreement between a newspaper-allied broadcast station and the allied newspaper with the degree of agreement between the newspaper and the non-allied broadcast station over the topics presented and the attitudes expressed. The second compared a broadcast station allied with a newspaper with a broadcast station not allied with the newspaper over topics presented, attitudes expressed, and a host of measures relevant to the service given to the public. The following is a summary of the cross media findings:

For television: Newspaper-allied television stations were found to have slightly *less* correspondence with their allied newspapers in the topics chosen for presentation, attitudes expressed in the stories, and significantly less agreement in attitudes expressed about items within a story than non-newspaper-allied stations. Non-newspaper stations were shown to express significantly more intense and more negative attitudes about common topics in their stories. Newspaper station attitudes were generally closer to the neutral position. Newspaper-allied stations were found to present fewer topics but longer stories, use approximately the same number of sources, but locally write significantly more of the stories they present.

For radio: Newspaper-allied radio stations generally showed less correspondence with their allied newspapers in the topics chosen for presentation, attitudes expressed in the stories and attitudes expressed about items within a story than non-newspaper-allied stations. Non-newspaper stations expressed significantly more intense attitudes about concepts presented by both station groups. Newspaper-allied stations tended to score more toward the neutral position, but both groups were more negative than positive. Newspaper-allied stations presented the

same number of topics and stories, but their stories were longer. Finally, newspaper-allied stations have a tendency to use more sources in their news broadcasts and to write more of the stories that they present.

From these results we can provide answers to the four questions we formulated in the introduction:

1) Will television outlets commonly owned with a newspaper evidence greater correspondence with that newspaper on subject matter and its treatment than separately owned stations?

The results obviously answer this question in the negative. The statistical analyses of our data clearly indicate similar degrees of correspondence among newspaper and non-newspaper-allied television stations. In fact, if we were to predict differences it would be in the direction of non-newspaper-allied stations showing greater correspondence with the market newspaper. The reason for this occurrence appears to be the heavier reliance of the non-newspaper stations on outside sources of news material.

2) Will radio outlets commonly owned with a newspaper show greater agreement in subject matter and its treatment with that newspaper than separately owned radio outlets?

Again, this question is answered negatively. The radio data appears to replicate the data obtained from the television stations. The effects are not as sharply drawn, however.

3) Within the same market and for stories ascertained to be about the same topic, will the pattern of treatment shown by newspaper-combined stations be different from the pattern shown by non-newspaper-combined stations?

Differences were indeed found. Holding to the traditional (if mythical) norm of "objective" news reporting, non-newspaper-allied television stations were found to deviate from that norm significantly more than newspaper stations in so far as they expressed more intense and more negative attitudes. Non-newspaper-allied radio stations were found to present significantly more intense attitudes in their news reporting.

4) Within the same markets, will the news service provided by newspaper-allied stations be different from the service provided by non-newspaper-allied stations?

In terms of numbers of topics covered, numbers of stories presented, length of stories, and number of sources used no statistically consistent differences could be found. One substantial difference did appear. Newspaper-allied broadcast stations write more of the stories they present. On the basis of this difference the service provided by newspaper-allied stations appears to be better recommended.

[Comments of NAB (1971), pp. 11-24; 59-63]

4. THE NUMBER AND DIVERSITY OF MEDIA OWNERS HAS GREATLY INCREASED OVER THE YEARS.

From time to time casual or uninformed comments are made or appear in publications suggesting that there has been an increasing concentration in media ownership over the years. Unwilling to accept this assumption without investigation, the NAB has commissioned an investigation to ascertain the facts with respect to this aspect of mass media. An extensive study of the matter was undertaken by Professor Christopher Sterling of the School of Communications and Theater of Temple University. The results are set out in NAB Exhibit C which has been filed with the FCC in this proceeding. The report is extensive and detailed and shows that the investigation was undertaken pursuant to rigorous scientific requirements of validation, checking and full disclosure of all data and details. The report speaks for itself and is too lengthy and detailed to attempt to recapitulate. However, the highlights are particularly significant since they not only fail to support the supposition of increasing media concentration but show that this is false and that the contrary is the case.

The Sterling study was made with respect to the one hundred largest markets. These were taken to be the standard metropolitan statistical areas because this was the only statistical device that could be used and projected backwards to provide a continuous series over the entire history of broadcasting. It does not correspond precisely to the ADI market definition used in the Seiden study (NAB Exh. A) but it encompasses the area where a great majority of the U.S. population

lives and, in the absence of ADI data, provides a fair statistical measure of the trends in mass media.

NAB Exhibit C shows that both the total number of media outlets and number represented by separate owners have increased markedly over the period from the beginning of broadcasting down to the latest year for which data are available. This is true whether the group examined is the top ten markets, the top twenty-five markets, the top fifty markets, or the top one hundred. Indeed, it appears that the increases have been largest in the smaller markets of the top one hundred. During the period from the beginning of broadcasting in 1922 down through 1967 the total number of media outlets in the top one hundred markets has increased by a growth rate of 254 percent. The number of broadcasting outlets grew nearly ten times, or 968 percent during the same period.

A statistical measure of media concentration was devised by establishing the ratio of voices, or separate media owners, to numbers of outlets, or separate facilities. This statistical measure shows that media concentration did increase somewhat from 1922 until 1950. However, in all market groups media concentration has decreased since 1950. If broadcasting is considered separately, the results are the same and the statistics show that concentration of ownership in the broadcasting field also peaked in 1950 and has decreased since that time.

Significantly, media outlets have increased at a faster rate than the population. In the top one hundred markets, the media outlets per one thousand of population decreased somewhat from the prosperous 1920's through the depression-ridden 1930's. However since 1940 the number of media outlets per one

thousand population has increased significantly, and by 1967 it was higher than it had ever been before. Media voices, in the sense of separate media owners, have also increased during the same period in relation to population.

Thus, it is clearly demonstrated that there has not been any increase of the concentration of ownership of daily media facilities (that is in broadcasting stations and daily newspapers) in the top one hundred markets since 1950, and at no time has the total proportion of such media held by concentrated owners been more than a third of all such media in those markets. Both the media generally and the broadcasting media have grown less concentrated in the period since 1950.

Newspaper ownership of broadcasting outlets has decreased sharply from the levels of 1940 and 1950 until today less then seven percent of all broadcasting stations are under common ownership with newspapers, and newspaper publishers are less than five percent of all broadcast station owners. A similar conclusion has been reached by ANPA research. ANPA, p. D27-28. Both the numbers and the proportion of broadcast stations not affiliated with any other media in the same market have increased since 1950, while the proportion of broadcast stations affiliated with other media (or other broadcast facilities) in the same market has decreased since 1950.

In addition, ANPA research has disclosed that the number of news reporting agencies has increased very substantially in recent years, ANPA, p. C-12, and ANPA calculates the increase in the number of media voices as amounting to 29% in the last two decades. ANPA, p. D-58. Overall, the outstanding fact is that both the number of separate media and the number of media

owners have increased at a faster rate than population growth and that by any valid statistical measure there is less concentration and greater diversity of ownership in the mass media today than there has been at any time during the last two decades. The trend is clearly toward greater numbers and greater diversity.

5. THERE IS NOW A PLETHORA OF MEDIA DIVERSITY IN THE UNITED STATES AND IN EVERY TELEVISION MARKET.

The proposed divestiture rule is stated in the Further Notice of Proposed Rule Making to have a two-fold purpose, which "is to promote competition and to increase the diversification of program and service viewpoints." Further Notice, para. 2. Similarly, the First Report and Order states that the multiple ownership rules, generally, have a two-fold objective which is, first, to foster maximum competition in broadcasting, and, second, to promote diversification of programming sources and viewpoints. First Report and Order, para. 3.

While diversity of broadcasting sources is thus, quite properly, extolled as socially desirable, it is significant that nowhere in either the First Report and Order or the Further Notice of Proposed Rule Making is any examination undertaken of the degree of diversity now existing in the United States and in the markets which are the subject of this proposed rule. The Further Notice states that 94 television stations are affiliated with newspapers. (para. 31) But this statement, even if accurate, says nothing about the degree of diversity now existing in the United States or in the various television markets. To illustrate, if a market has only

one newspaper, one television station and one radio station, then common ownership of these three media constitutes a relatively high degree of concentration of control. On the other hand, if a market has two newspapers, five television stations and fifty radio stations, and if each newspaper is affiliated with one of the television stations and there is no other cross-ownership, there is relatively little concentration of control in this market. But the method of measurement used in the Further Notice would report the first market as having 1 newspaper affiliated television station and the second market as having 2 newspaper affiliated television stations. Standing alone, such figures would suggest that the second market is more concentrated than the first; although this is obviously a wrong conclusion and the second market has far more diversity of media voices than the first. Simple statistics as to numbers of "newspaper affiliated" or "group owned" broadcasting facilities give no information as to diversity of media. If 94 additional and new television stations were to be established in major markets by newspapers not now affiliated with any broadcasting facility, this should increase, not decrease, any numerical index of media diversity in the markets affected. Yet it would double the simple statistic cited in the Further Notice, and therefore would *appear* to increase concentration, although the actual effect would be the opposite. Consequently it must be concluded that the figures cited in the Further Notice simply are not relevant to the issue of diversity.

The fact is that until the institution of the present proceeding, there has been no general and reliable census of media in the television markets of this country. The taking of such a census is a most difficult and expensive task, as the NAB has discovered.

However, the NAB has felt that the FCC cannot properly and intelligently undertake action in this field, and other parties cannot intelligently comment on the proposed divestiture rule, without information as to the actual amount of diversity in media sources now existing.

Accordingly, the NAB has commissioned a complete study of this subject to be made and has filed the results with the FCC in NAB Exhibits A-1, A-2, A-3 and A-4. These are four volumes comprising a study of the subject "Mass Communications in the United States–1970". Volume 1 is a summary volume which sets forth a description of the methodology followed in the study and also a list of all of the television markets in the United States, comprising some 204, with a table showing the number and kinds of media in each market, the numbers of those originating in the market and the numbers of those entering the market, and the numbers of owners of the media originating in the market and entering the market. Volumes 2, 3 and 4 of this study contain complete listings of all of the media referred to in the summaries in volume 1. The details are too extensive and voluminous to be summarized here and those interested are urged to consult the summary volume. However, the significance of the data presented in this study can be indicated by some brief statistics, and the general nature of the facts presented in this study must be known and understood in order to approach the problems raised by the proposed divestiture rule intelligently.

It is occasionally stated by those who are partisian or uninformed that the media in this country are controlled by a few and that the public has only a very limited number of media presenting news, information

and other programming to it. The facts are completely contrary. The NAB survey of mass communications in the United States covers only television, radio, daily newspapers, weekly newspapers, and national magazines. It does not include numerous other sources such as motion pictures, the theater, CATV, books, local and regional magazines, and other media sources. However, the NAB study shows that even among the broadcasting and journalistic media surveyed there is a plethora of diversity in the United States and in every significant market.

For example, in New York City there are at least 610 media in the market available to the residents. The 610 media are owned by a total of 434 different owners. Of the total number of media in the market, 519 originate in the market and these are owned by 372 different owners. (The source for these and following data is NAB Exhibit A-1.)

The figures are slightly smaller but equally impressive for the other large cities. The average for the top fifty markets shows a total of 217 media available to the residents of each of those markets and shows that the 217 media are owned by 170 owners in each of these markets. The average for the top 50 markets shows 139 media originating in each market, owned by 111 owners.

Moving to the other end of the scale, the smallest markets, the survey shows that the smallest market in the United States is Glendive, Montana. In this market there are a total of 36 media, owned by a total of 30 different owners, which is the smallest number of owners of media in any market in the United States. Of the total number of media in the market of Glendive, there are five originating in the market owned by four

different owners. In terms of local origination, the most concentrated market in the United States is Zanesville, Ohio. This market has only four locally originating media which are owned by two different owners. However, in Zanesville, Ohio, the residents have access to a total of 49 different media owned by 39 different owners.

Looking at the markets in groups of fifty, we find that the average numbers of media both in the market and originating in the market, as well as the average numbers of owners of those media, is very numerous for all markets. The average numbers are set forth in the following table:

Average Number of Media and Owners

	Total number in market		Number originating in market	
	Media	Owners	Media	Owners
Markets 1-50:	217	170	139	111
Markets 51-100:	161	130	80	68
Markets 101-150:	116	95	47	41
Markets 151-204:	76	63	21	18

The best profile that can be presented of the diversity of media and media owners in the television markets of the United States is to show the averages for the quartiles of the markets grouped by size. This is done in the following four tables which show the average number of media and the average number of media owners for the largest fifty markets, the second largest fifty markets, the third largest fifity markets, and the smallest fifty-four markets.

AVERAGE NUMBER OF MEDIA AND MEDIA OWNERS 1970

Markets 1-50

	Total No. in Mkt.	Number Originating in Mkt.	Number Entering Mkt. Total	Number Entering Mkt. +5% of Mkt.
Media	217	139	78	15
Owners	170	111	59	13
TV Stations	18	5	13	0
Radio Stations	65	45	20	1
Daily Newspapers	27	17	10	0
Weekly Newspapers	73	73	0	0
Magazines	35	–	35	14

AVERAGE NUMBER OF MEDIA AND MEDIA OWNERS 1970

Markets 51-100

	Total No. in Mkt.	Number Originating in Mkt.	Number Entering Mkt. Total	Number Entering Mkt. +5% of Mkt.
Media	161	80	81	17
Owners	130	68	62	15
TV Stations	16	3	13	0
Radio Stations	48	25	23	2
Daily Newspapers	19	9	10	1
Weekly Newspapers	43	43	0	0
Magazines	35	–	35	15

AVERAGE NUMBER OF MEDIA
AND MEDIA OWNERS 1970

Markets 101-150

	Total No. in Mkt.	Number Originating in Mkt.	Number Entering Mkt. Total	+5% of Mkt.
Media	116	47	69	18
Owners	95	41	54	16
TV Stations	13	3	10	1
Radio Stations	32	15	17	2
Daily Newspapers	12	5	7	1
Weekly Newspapers	23	23	0	0
Magazines	35	–	35	14

AVERAGE NUMBER OF MEDIA
AND MEDIA OWNERS 1970

Markets 151-204

	Total No. in Mkt.	Number Originating in Mkt.	Number Entering Mkt. Total	+5% of Mkt.
Media	76	21	56	22
Owners	63	18	45	19
TV Stations	9	2	8	2
Daily Newspapers	7	2	5	1
Weekly Newspapers	10	10	0	0
Magazines	32	–	32	15

Simple scanning of these tables should be more persuasive than any amount of hortatory rhetoric with respect to the actual existence of diversity of sources in both broadcasting and the media generally in the markets of the United States. In terms of averages,

from the smallest to the largest groups of markets, the total number of media available to the residents of these markets ranges from 76 to 217, which are owned and controlled by, respectively, 63 and 170 different owners. It certainly cannot be contended rationally that there is any lack or anything less than a plethora, of media in markets which have as many as more than six dozen media available to the residents. Furthermore it must be kept in mind that the media surveyed and referred to above are not all of the media in each market, but are primarily the broadcasting and journalism media.

The suggestion that there is a concentration of control, or a trend toward concentration or lessening of numbers in either broadcasting or journalism is simply not accurate. In the First Report and Order it is said (para. 22) that the number of daily newspapers has been decreasing. This is not correct. The number of daily newspapers has remained substantially the same for the last twenty-five years, as can be ascertained from a number of sources. The Saturday Review (February 13, 1971, pp. 54-55) reports that:

> "In 1946, the number of daily newspapers in the United States was 1,763. Twenty-three years later, on January 1, 1970, the number was 1,761—a loss of two. In this outwardly static history there was considerable internal ebb and flow.
>
> * * *
>
> The modernization of the small-town newspaper dramatizes a striking difference between the newspaper industry and most other since the Second World War. While other industries have advanced with larger firms swallowing up the

smaller and weaker, in the newspaper industry the stability and growth of the small and weak have been at the expense of the strong. Based on newsprint consumption, here is the pattern of growth in cities of various sizes in the Wisconsin report:

Population	Percentage of Increase
one million or more	41.3
500,000 to one million	50.1
250,000 to 500,000	60.8
100,000 to 250,000	62.3
less than 100,000	93.2

In plain English, the smaller the city the greater the growth. The index of newsprint consumption is the most significant measure of newspaper growth, according to the Wisconsin report. Here is the real explanation of the paradox of an almost zero growth in the number of daily newspapers in the midst of overall industry expansion."

The situation with respect to the diversity of media in the United States has been well summarized by the respected reporter James Reston, who has written as follows:

> "Actually, with the rise of television and radio broadcasting stations, the sources of information in the United States have dramatically increased in recent decades, breaking the monopoly of the printing press.
>
> * * *
>
> Out of this vast network of stations and newspapers now pours out night and day the greatest flow of information and the loudest clash of divergent opinion ever inflicted on a long-suffering people in the history of the written and spoken word." (N.Y. Times, Nov. 21, 1969, p. 46)
>
> * * *

10. FORCED DIVESTITURE WOULD IMPOSE A VAST AND UNNECESSARY BURDEN ON THE MASS COMMUNICATIONS SYSTEM WHICH WOULD TEND TO DETERIORATE PROGRAM QUALITY AND DECREASE PROGRAMMING DIVERSITY.

The NAB has made no separate study of the economic burden that would be imposed upon the mass media by the proposed divestiture rule but has had access to the economic studies commissioned by the ANPA. To the extent that these studies are corroborated by the accumulated experience and observation of the NAB officials they are relied upon.

Briefly summarizing the situation it appears that the proposed divestiture rule would require the divestiture of approximately 475 separate broadcasting facilities owned by newspapers. See ANPA pp. A-7 and B-4. (Although the ANPA studies refer to 332 broadcast properties they count 143 combined AM and FM stations as single facilities rather than as 286 licensed facilities.) In addition to these stations there are several hundred combination television and radio stations that would be affected by the proposed divestiture rule. The total value of all these broadcasting facilities cannot be ascertained precisely but the ANPA studies indicate the value of newspaper owned facilities will aggregate about $2 billion. ANPA p. A-8. From these data it can be extrapolated that the value of jointly owned television and radio facilities will aggregate about another $1 billion. Furthermore, it is obvious that the value of these broadcasting facilities will be substantially depressed by the proposed divestiture rule which will force an abnormally large number of properties onto

the market within a relatively short period of time. The depression in values that will thus occur is estimated to be between 10% and 40% of the total value. ANPA pp. A-11 and B iii.

It further appears that the original cost of the properties involved in these broadcasting facilities is considerably less than either the replacement value of the tangible assets or the appraised present value of such assets. ANPA p. B-5. The difficulties of raising the capital necessary to purchase these very numerous and very valuable communication facilities are many and substantial and are spelled out in considerable detail in the ANPA studies. Among other things, it is shown that the purchasers will have to pay high interest charges on capital borrowed to purchase diverted facilities. ANPA p. B-23,

From these and other detailed facts spelled out in the ANPA studies it becomes certain that forced divestiture of the properties that would be effected by the proposed rule will impose a very great financial and economic burden upon the owners and operators of these communications facilities, and therefore upon the communications system. This economic burden will necessarily have consequences that are directly contrary to the objectives sought by the FCC and will inevitably frustrate the aims of the proposed divestiture rule.

As demonstrated in the studies referred to above, most of the broadcasting properties which would be affected by the proposed divestiture rule have a relatively low original cost. In many cases these facilities have been owned by their present licensees for many years. The tangible properties have been accumulated over a long period of time. In some cases the tangible properties may now be fully depreciated even

though they are still entirely useful. There is nothing particularly unusual about this situation. Many homeowners are now living in housing that they purchased years ago which is worth vastly more than their original cost. Furthermore, like the owners of business properties, many homeowners have invested relatively small amounts in their houses over the years so that the aggregate market value of the house today is very much above the original cost plus the cost of the improvements over the years. This disparity is increased with respect to business properties by the fact that they are depreciated over time as a result of tax considerations. Thus it is inevitable that the market value of the broadcasting facilities which would be affected by the proposed divestiture rule is considerably greater in virtually all cases than the cost to the present owners.

As a consequence of this factor the purchasers, assignees, and new owners of the affected broadcast facilities, whoever they may be, will become owners at a very substantially increased cost over the present owners and licensees. This means, among other things, that the expenses of the new owners will be very much greater than the expenses of the present owners. To begin with, the new owners will have to meet payments on the capital costs of the properties purchased. This will be true regardless of whether or not the new owners pay their own capital out of savings or accumulated earnings, borrow the money to make the purchases, or purchase from the present owners and licensees on an installment basis. In addition to the payments that will be required for capital costs, the new owners will be required to pay interest on any monies borrowed and will also be required to earn a reasonable return on a much higher investment than any of the present owners and licensees have.

By thus increasing the capital cost of the broadcasting properties affected by the proposed divestiture rule and increasing the expenses which will have to be borne by the new owners, the proposed divestiture rule will inevitably decrease the amount available to be spent for programming, including news, since it will certainly not have any tendency to increase broadcasting revenues.

The effect of this should be apparent to the FCC which has some experience with these matters in the field of common carrier rate regulation. The effect of the proposed divestiture rule on the broadcasting industry will be approximately equivalent to the effect on telephone rates that would follow if the rate base were suddenly doubled without any other change in equipment or accounting or financial statements. It is obvious that this effect is to increase the cost to the consumer without improving the quality of service. Similarly, in the broadcasting field the effect will be to decrease the amount available for programming without significantly affecting any of the other elements in the situation. One does not need to be an expert to understand that if the amount of money available for programming is substantially decreased both the quality and the diversity of programming will be substantially decreased. Consequently it is apparent that the inescapable economic effect of the proposed divestiture rule will be to deteriorate program quality and decrease programming diversity without compensating benefits to the public.

[Sterling, "Ownership Characteristics of Broadcasting Stations and Newspapers in the Top 100 Markets: 1922-1967" (March 5, 1971) (NAB Exhibit C), pp. 1-31]

Brief Summary of Major Findings

1. There has *not* been an increase in concentration of ownership in daily media (broadcasting stations and daily newspapers) in the top 100 Standard Metropolitan Statistical Areas since 1950. At no time has the total proportion of such media held by concentrated owners been more than a third of all media. (see p. 21).

2. Similarly, broadcasting ownership has grown slightly less concentrated in the 1950-67 period. (see p. 22).

3. Newspaper control of broadcasting outlets has decreased sharply from levels of 1940 and 1950 until today less than 7% of all broadcasting stations are under press control. Newspapers publishers make up less than 5% of all broadcast station owners. (see pp. 24-25).

4. The proportion of independent (single) broadcast stations has increased since 1950 while the proportion of multiple (radio-TV, or AM-FM in the same market) has decreased. This growth of independent stations has been especially pronounced in the top 10 and top 25 markets. (see p. 24).

5. Group or conglomerate control of broadcasting stations has increased sharply since 1950. It is suggested, however, that such owners derive their economic muscle from stations in many separated markets rather than concentration in a single market. (see pp. 25-27).

6. Media outlets (stations and newspapers) and voices (owners) have increased at a faster rate than population growth. The future trend cannot be predicted without making assumptions about technology and economics that go beyond available evidence. (see pp. 28-29).

Introduction: The Problem

On March 25, 1970, the Federal Communications Commission (FCC) adopted its proposed rule barring the owner of any full-time broadcasting station from acquiring another in the same market, whether AM, FM, or television. At the same time, the Commission gave notice of a further proposed rule-making to require, within a five-year period, that any existing broadcasting combinations be required to divest themselves of media such that they would be reduced to no more than an AM-FM combination, a television station, or a newspaper in any single market area. There were some suggested exceptions to the ruling as proposed, but in essence it marked the clearest FCC stand on ownership since overall station ownership limitations were last adjusted in 1954.

The proposed rule-making was based on several assumptions regarding media ownership patterns and trends. In response to the FCC proposed rule-making, the National Association of Broadcasters (NAB) decided to initiate a number of studies, to examine these assumptions. One would examine the status of media ownership today, another would analyse past trends in ownership as well as other studies. The first of these has already been filed and publicly reported (see "Seiden Counts a Multitude of Media," *Broadcasting*

(February 1, 1971), pp. 34-35), and the second is offered now. As will be seen in the sections of this report on Methods and Approach, Definitions-Explanation of Materials, and Limitations, the present study differs in several ways from the Seiden research, but the overall applicability of this work with the Seiden study still should be apparent. Used together, the two studies present a picture of ownership characteristics in media spanning nearly half a century.

This study seeks only to answer the question *how much* media control has been concentrated in selected past years—i.e., what has been the ownership trend? To seek out the answers to this question and related ones, the following hypotheses were tested:

A. Trends in Number of Media

1. That the total number of media outlets has increased over the period covered (1922-67).
2. That the total number of media voices has increased over the period covered.
3. That the total number of broadcasting outlets has increased over the period covered.
4. That the total number of broadcasting voices has increased over the period covered.
5. That the total number of daily newspaper outlets has decreased over the period covered.
6. That the total number of daily newspaper voices has decreased over the period covered.

B. Ownership: General

7. That media ownership (the proportion of voices to outlets for both broadcasting stations and daily newspapers) has become more concentrated since 1950.

C. Ownership: Broadcasting

8. That broadcasting station ownership (the proportion of voices to outlets) has become more concentrated since 1950.
9. That the proportion of independently-owned (single) station outlets has increased while the proportion of multiple-owned broadcasting outlets has decreased since 1950.
10. That the proportion of independently-owned (single) station voices has increased while the proportion of multiple-owned broadcasting voices has decreased since 1950.
11. That the proportion of newspaper-controlled broadcasting outlets has decreased relative to all broadcast outlets.
12. That the proportion of newspaper-controlled broadcasting voices has decreased relative to all broadcast voices.
13. That the proportion of group and conglomerate-controlled broadcasting outlets has increased relative to all broadcast outlets.
14. That the proportion of group and conglomerate-controlled broadcasting voices has increased relative to all broadcast voices.
15. That AM-FM combinations have increased at a faster rate than radio-TV combinations since 1950.

D. Ownership: Newspapers

(Because this study was of broadcasting ownership specifically there are no hypotheses concerning newspapers except those noted in five and six above, and those concerning newspaper ownership of broadcast stations)

E. Media and Population Growth

16. That in the markets studied, the number of media outlets has increased at a faster rate than population.
17. That in the markets studied, the number of media voices has increased at a faster rate than population.

It is assumed that readers of this study are acquainted with the major institutions and structure of American broadcasting. It is believed, for the reasons stated in subsequent sections, that the method used here (see next section) will give a valid picture of actual trends in the markets studied over the years covered (see also section on Limitations, on p. 16).

Methods and Approach

This project, like most, has had two major parts—seeking out and recording primary data, and analysis of that data in light of pre-established hypotheses. In this section the mechanical process involved in such gathering, recording and analysing is briefly described.

Structuring the sample. Having established the period for investigation (the years when broadcasting stations existed), it was decided to collect data for the years 1922 (the first year when sizable numbers of broadcasting stations were on the air), 1930, 1940, 1950, 1960 (years when data could be compared to the

decennial census), and 1967 (the last year for which redefinition of Standard Metropolitan Statistical Areas (see section on Definitions-Explanation of Materials on p. 11) was available), thus giving us six sample years in nearly a half century of change in both broadcasting and daily newspapers. To keep the project clearly defined and to save time, it was decided at the outset to use SMSAs as the unit of measure of each market, counting not the media actually received in each area, but only the media actually originating there (see Limitations on p. 16).

SMSA data gathering. The list of 100 top SMSAs as of 1967 was taken from Census Bureau data (see Appendix D), and population figures for 1920, 1930, 1940, 1950, 1960, and 1967 were derived from the same source (see Appendix F and G). For 1920 and 1930 it was necessary to "reconstruct" SMSAs as that data tool did not exist then, so population data for counties within the 1967 SMSA definitions were added to approximate the earlier data so as to make the entire project comparable. With basic data at hand, percentages of increase (or decrease) were figured on a Friden programmable calculator.

Broadcast data gathering. The next step was to gather broadcast station ownership information for the selected years. As there was no *Broadcasting Yearbook* published in either 1922 or 1930 (the first came in 1935), data for those year came from other (primarily government) sources (see Appendix H). Data for 1960 was gathered first under the assumption that most varieties of ownership would have shown by that time, so that any unforseen problems could be worked out. As a result of using 1960 information this way, worksheet design was changed, definitions were refined and similiar operational changes were made. Broadcasting data was then recorded for 1920, 1950, 1930, 1940, and 1967 (the odd order being set primarily by

initial availability of source material). As the project assistant (see Appendix I) finished entering data for each year, he and the principal investigator went over that data, checking trends and spot-checking for errors or unusual data situations requiring double-checking.

Newspaper data gathering. Newspaper information was retrieved from *Editor and Publisher Yearbook* for each sample year.

The broadcasting and newspaper data was entered on worksheets (see sample on following page). Final typed copies of that data for each market for each sample year are presented in Volumes II through VII of this report.

Tabulation process. After the more than 800 pages worth of raw data were collected, the next step was to assemble the material into tabular form. Having analysed the hypotheses and data, tables were devised (see Appendices A, B and C). After a good deal of work by several people, a sheet for tabulating data (the mid-way point between the worksheets and final tables) was devised (see sample on page after next). Some 10 people, mainly graduate students were recruited and trained to enter the worksheet data onto the tabulation sheets. Students worked in pairs and each tabulation sheet was double-checked by a different person. Proportions and population data were then figured on a Friden programmable calculator and were entered on each sheet.

Table construction. The completed tabulation sheets (one for each market for each year, or 600 sheets) were then used to fill in the tables. The principal investigator and his wife did this job because of the need for constant cross-checking and complete familarity with the data. As Tables C (Outlets) and B (Voices) were

Market_____ Year-Page_____

1967 SMSA Rank_____ Population for Date_____ % Change_____

Broadcasting Stations

Call letters	AM	FM	TV	Ind.	Newsp.	Group	Congl.	Name of Ownership Unit
								TOTALS

Daily Newspapers

Title (Place)	Ind.	More	Beast.	Group	Congl.	Name of Ownership Unit

filled in, constant checking of previous figures, math, and machine calculations was done to assure accuracy in data handling and transfer. Table A, derived in part from Tables B and C and in part directly from the tabulation sheets, served as further opportunity for further cross-checking and took more than a week to complete itself.

The final step in the project was analysis of the resulting data and writing of this final report.

Definitions-Explanations of Materials

This report comes in two parts—the detailed reports of media holdings in each of the top 100 SMSAs (found in volumes II through VII), and the summary tables (Appendices A, B and C) and report derived from that specific data. The definitions and explanations below follow the same division, giving information first for the worksheets (Volumes II through VII) and then for the tables and report in this volume.

First of all, some general definitions referring to the entire project (worksheets and final tables):

- media: educational and commercial broadcasting stations (AM, FM, and TV) and daily newspapers

Market Data

- SMSA: Standard Metropolitan Statistical Area as defined by the Bureau of the Census, Department of Commerce. For the purposes of this report, the definitions are those of 1967 (see Appendix D).
- top 100: the first 100 SMSAs as ranked in 1967. For ease in comparison, the exact order used in 1967 will be used in all years even

though many markets (especially those in the South and West) didn't actually get into the top 100 until after World War II or later, and the rank order of others has changed over the years.

- market or local market: any one of the top 100 SMSAs as ranked in 1967.
- population: with the exception of 1922 media information, the population shown on the worksheets is for the same year as the market information. Media data for 1922 is compared with population data for 1920, the last regular decennial census. Population figures are those of the respective decennial years with the exception of 1967 which are Bureau of the Census estimates for that year (see Appendices F and G). "Percent Change" figures refer to the growth of population in that market since the previous census.
- top 10, top 25, top 50, top 100: break-outs of groups of the top 100 SMSAs.

The definitions which follow next refer specifically to the headings found on the worksheets (Volumes II through VII) and are divided into broadcasting and newspaper sections like those sheets.

Worksheets: Broadcasting

- call letters: shown as listed in each year's *Broadcasting Yearbook*. If more than one set of call letters is shown, it indicates one of the stations in a combination (radio-TV or AM-FM) has call-letters differing from the other(s). Additional information is given here in three cases:
  - E: educational and/or noncommercial station (after call-letters).
  - *: stations assigned but not yet on air
  - +: stations assigned but now off air having once been on.

– AM-FM-TV: an "x" in one of these columns indicates the station(s) using the call letters. Totals for each market are shown at the bottom of each column.

– ind(ependent): a station or combination of stations (AM-FM, or radio-TV) licensed to an individual, firm, or institution which does not control any other medium in that market or elsewhere.

– newsp(aper): a station or combination of stations licensed to an individual, firm, or institution which also has controlling interest in a newspaper in the same market (controlling is defined as "more than half *or* the biggest single share, whichever is applicable").

– group: a station or combination of stations licensed to an individual, firm, or institution which also has controlling interest in broadcasting stations in other markets.

– congl(omerate): a station or combination of stations licensed to an individual, firm, or institution which also has controlling interest in other media in other markets as well as other (non-media) business interests.

– name of ownership unit: this is shown only for those stations not listed as independent. In the case of newspaper control, the local newspaper is listed by title. Location of station, if other than the named SMSA city, is noted in parentheses.

Worksheets: Daily Newspapers

– title (place): Masthead title of daily (morning or evening) newspaper and city in which it is located, if other than the named SMSA city. Any daily newspaper shown as being a part of that market (see Method and Approach on p. 7)

is listed even if it is of specialty interest (e.g., *The Daily Racing Form* or business-emphasis dailies).

– ind(ependent): a single newspaper under an owner which does not control any other medium in that market or elsewhere.

– more: a single newspaper under an owner which also has controlling interest in another newspaper (or newspapers) in the same market.

– b(road)cast: a single newspaper under an owner which also has controlling interest in a broadcast station or combination of stations in the same market (controlling is defined as "more than half *or* the biggest single share, whichever is applicable").

– group: a single newpaper (or newspapers) under an owner which also controls one or more newspapers in other markets.

– congl(omerate): a single newspaper under an owner which also has controlling interest in other media in other markets as well as other (non-media) business interests.

– name of ownership unit: shown only for those newspapers not listed as independent. In the case of broadcast station ownership, the local station call letters will be listed.

Worksheets: Important Note

– on ownership: in both the broadcasting and newspaper sections, with the exception of those media noted as being independently owned, more than one of the categories noted above may be applicable (e.g., a radio station could be owned by a conglomerate with a local newspaper and a group of broadcasting stations). In such cases, only a single ownership designation

has been made—to the highest degree of concentration applicable. The way the worksheets are set up, this would mean placing an "x" as far to the right as applicable to avoid double-counting a single unit of the medium under several ownership possibilities (in the example just given, an "x" would be placed under "congl(omerate)" for both radio station and newspaper).

In putting together the summary tables in this volume, some variation in this usage was necessary to more clearly explain the data. As will be seen in appendices A, B, and C, there are three different basic tables on which all data is summarized. The definitions below are presented, as for the worksheet information above, in the order (left to right) of the headings on each set of tables. As Appendix table A is derived from Appendix tables B and C, definitions will be given starting with Appendix table C.

Appendix Table C: Outlet Summary

- outlet: individual unit of daily mass media (i.e., an AM, an FM, or a TV station, or a daily newspaper) in a given market.
- rank and market name: the common short name for the market, with a number indicating the SMSA rank held in 1967.
- b(road)cast stations: four columns here show the total number of stations in each category (AM, FM, and TV) with the last column being a total of all stations in that market that year.
- indep(endent) prop(ortion): shown only for 1950, 1960, and 1967, this figure shows the proportion of single stations (no matter how owned) to all stations in the market. Figure rounded to nearest tenth (e.g., .078 becomes .08, .064 becomes .06).

- mult(iple) prop(ortion): shown only for 1950, 1960, and 1967, this figure shows the proportion of multiple station combinations (AM-FM, or radio-TV), no matter how owned, to all stations in the market. This figure and the one just above (to the left on the table) should add up to 1.00 though small variations may be present due to rounding. Figure rounded to nearest tenth.
- newsp(aper) prop(ortion): figure shows the proportion of outlets controlled by newspapers in the same market. Figure rounded to nearest tenth.
- group prop(ortion): figure shows the proportion of outlets controlled by group *and* conglomerate owners. Figure rounded to nearest tenth. *Note:* for purposes of tabulation here, "group" and "conglomerate" categories which were shown separately on the worksheets, are here combined under one heading because (1) the study concentrates on media holdings in individual markets and thus the group-conglomerate difference is not critical, and (2) the line between groups and conglomerates often was hard to draw because of reliance on secondary source materials often lacking complete data for conglomerates. If a station is part of a group or conglomerate also owning a newspaper in the same market, the station was tabulated twice—under newspaper proportion and under group proportion so that both figures would be fully meaningful while at the same time not being additive.
- newsp(aper) total: the total number of different daily newspapers in the market area, regardless of ownership.

– total outlets: the total of broadcast and daily newspaper outlets shows the total number of media outlets originating within the SMSA.

Appendix Table B: Voice Summary

– voice: single ownership unit of daily mass media (e.g., an AM-FM-TV combination is a single voice owning three outlets) in a given market.

– rank and market name: see Appendix Table C.

– broadcast stations: figures in these four columns show stations or station combinations under one owner including (1) single stations (where outlets and voices are the same), (2) AM-FM combinations, and (3) radio-TV combinations (including AM-TV, FM-TV and AM-FM-TV). The total column is a count of all broadcast voices (or owners) in the market.

– indep(endent) prop(ortion): figure shows the proportion of single-station voices to all broadcast voices in the market. Figure rounded to nearest tenth. Shown only for 1950, 1960, 1967.

– mult(iple) prop(ortion): figure shows the proportion of multiple-station voices to all broadcast voices in the market. Figure rounded to nearest tenth. Shown only for 1950, 1960, 1967.

– newsp(aper) prop(ortion): figure shows the proportion of voices controlled by newspapers in the same market. Figure rounded to nearest tenth.

– Group prop(ortion): figure shows the proportion of voices controlled by group *and* conglomerate owners. Figure rounded to nearest tenth. See also "*Note*" under this heading for Appendix Table C.

– newspapers: these two columns show the total number of newspaper voices in the market, and the total number of ind(ependent) newspaper voices which is the same as total voices unless some voices have broadcasting interests. Broadcast-connected newspaper voices are subtracted to give an artificial figure useful only in getting the last column (total voices) because otherwise cross-media owners would be counted twice—once under broadcasting, and once under newspapers.

– total voices: sum of broadcasting voices and independent newspaper voices shows the total number of media voices originating within the SMSA.

Appendix Table A: Media and Population Summary

– rank and market name: see Appendix Table C.

– outlets: these four columns show (1) the number of broadcast outlets, (2) the total number of daily media outlets (both of these columns taken from Appendix Table C), (3) the number of outlets per 1000 population, and (4) the number of people per outlet in the market area.

– voices: in a similiar fashion, these four columns show (1) the number of broadcast voices, (2) the total number of daily media voices (both of these columns taken from Appendix Table B), (3) the number of voices per 1000 population, and (4) the number of people per voice in the market area. *Note*: as there are usually fewer voices than outlets, there will nearly always be more people per voice than per outlet, and fewer voices per 1000 population than outlets per 1000.

– prop(ortion) of voices to outlets: these two columns give proportions which show (1) the proportion of broadcast stations which are concentrated (that is, held by owners of more than one outlet per voice *in that market*), and (2) the proportion of all daily media (broadcasting stations and daily newspapers) which are concentrated (that is, held by owners of more than one outlet per voice *in that market*). In either case, group or conglomerate owners with only a single outlet in the market will be counted as *un*concentrated owners in that market. The smaller the number or proportion, the closer that market is to total lack of concentration (.00 shown as ——). Figures rounded to nearest tenth.

In all cases in the tables, a figure of less than .01 (rounded to the nearest tenth) is shown simply as a dash. Each of the Appendix tables has a four page summary which shows information (1) by market group (top 10, top 25, top 50, and top 100) per year, and (2) by year per market group. The two summaries (each two pages long) have identical information presented two different ways for comparison variability.

Limitations of the Study

The following points are suggested as the major limitations in the study and its results:

1) SMSA limitation: As basic tool in delineating markets, the study uses the artificial SMSA geographical definition (which follows political (county) lines) rather than the larger area of the Area of Dominant Influence (ADI), the more common method in broadcast audience research of determining true coverage of stations, or the

overall economic market area (which would record the Los Angeles area as a single market rather than the two SMSAs used here). Many ADIs or economic market areas are broken up here into smaller SMSA units which are artificial as far as media reception is concerned, and thus often do not adequately reflect the true coverage, circulation, or ADI of either print or broadcast media. Because the ADI is a relatively new concept, however, the SMSA was used as the simplest means of delineating markets and obtaining comparable population figures over a long span of years. Use of the SMSA probably tends to overstate the decline in the number of newspapers, since the principal newspaper growth in recent years has occurred in the suburbs, and often beyond the SMSA.

2) Media Exclusions: Only newspapers published at least six times a week (daily) and broadcasting stations are covered in this study. The study omits weekly (or other periods of issue) newspapers, all magazines (many of the bigger markets have magazines originating within the SMSA), books, CATV systems (an increasing number of the larger systems are doing some local origination) etc. It is believed that the dailies and stations reported here represent the predominent daily media potential for news and entertainment communication in the 100 top SMSAs. In a very few cases in 1960 and 1967, some broadcast stations not yet on the air, or once on but then off, were recorded as normal outlets and voices on the air. Such stations are clearly marked in the worksheets, but to avoid complications in tabulation, they were simply included as normal broadcast operations. Because of their limited numbers, it is not believed they will harm the data to any statistically significant degree.

3) Secondary Sources: Because of time limitations, only *Broadcasting Yearbook* (plus other source material for 1922 and 1930 broadcast information), and *Editor and Publisher Yearbook* were utilized. No attempt was made to check the data in these secondary sources with primary FCC information or with other sources (such as *Ayer's Directory of Newspapers and Periodicals*). The data presented thus depend in large part on the validity of information provided in these publications.

4) Use of 10 Year Periods: Because of time limitations, the study could not be based on single or five year intervals, so even decades were chosen because (1) it was felt trends would be fairly represented in that period of time, and (2) adequate and comparable population data was available in the decennial census years.

5) Uneven "Tails": 1922 and 1967 were the first and last years for which data was collected rather than 1920 and 1970 because (1) there was virtually no broadcasting in 1920, so 1922 was chosen as the earliest year when sizable numbers of broadcast stations could be compared to newspapers, and (2) 1967 marked the last re-definition of SMSAs with new population estimates available before 1970 census data (which, along with 1970 media information, was not yet available).

6) Hand Processing: Primarily because of time limitations (but also because of the difficulty in transferring worksheet data to punch cards), the decision was made to hand-tabulate the data rather than submitting it to key-punching and computer analysis, which might have led to more reliable tables and analysis. The raw data are at hand, however (see Volumes II through VII), so that additional analysis,

using such computer processing is still possible in the future.

7) Estimated Rate of Error: In an effort to provide readers with an estimate of data collection, transfer and tabulation, and arithmetic analysis reliability, the following check was made. At the worksheet stage, before tabulation, every tenth market was checked with the original source material by someone other than the project assistant who did the original work. When the two sets of worksheets for those markets were compared, it was found there was an error rate of approximately 3% for broadcasting data and 2% for newspaper information. This ratio applied to any information supplied for either medium. When the worksheets were typed to make final copy for Volumes II through VII, a random check of ten markets was made to assure reliability of data transfer. In the tabulation process, all transfers, math work, and machine calculations were done twice by two different people. Transfer of data from tabulation sheets to tables was also double-checked. Appendix Table A provided the last check as it correlated the results of Appendix Tables B and C. In all cases, when rounding proportions, anything less than .005 was rounded down, and .005 was rounded up.

Results

The final results of this study are presented on the following pages in numbered sections corresponding to the hypotheses on pp. 4-5.

A. Trends in Number of Media

1. In the 1922-67 period, the total number of daily media outlets has increased by a factor of 254%. This is a combination of great broadcasting growth and limited newspaper decline (see paragraphs three and five below). See Table 1 for specific figures.

2. In the same period, the total number of daily media voices has increased as well, though not as much or as fast, by a factor of 166%. Again, this rate of increase is a confirmation of fast growth in broadcasting and limited newspaper decline (see paragraphs four and six below). Specific figures are in the following table:

Table 1: Total Media Outlet/Voice Growth

	Outlets		Voices	
Market Group	Growth Rate	1922 to 1967	Growth Rate	1922 to 1967
Top 10	168%	286 to 767	103%	271 to 550
Top 25	195	436 to 1288	128	401 to 916
Top 50	226	635 to 2067	162	599 to 1476
Top 100	254	877 to 3104	166	829 to 2205

Source: Appendix Table A-1

3. The number of broadcasting outlets grew nearly ten times or 968% from 1922 to 1967. As is seen in Table 2, the growth rate was especially high in the smaller markets (below the top 25).

4. Broadcasting voices increased by a hefty margin as well—676%, with the greatest growth again coming in the smaller markets as is seen in the following table:

Table 2: Broadcast Outlet/Voice Growth

	Outlets		Voices	
Market Group	Growth Rate	1922 to 1967	Growth Rate	1922 to 1967
Top 10	642%	81 to 601	440%	81 to 437
Top 25	675	134 to 1038	459	134 to 749
Top 50	815	185 to 1692	565	185 to 1231
Top 100	968	242 to 2585	676	242 to 1877

Source: Appendix Table A-1

5. In newspapers, the growth pattern has been a negative one of relative and absolute decline. The number of daily newspaper outlets in the top 100 SMSAs declined by nearly a fifth, as shown in detail in Table 3.

6. The number of daily newspaper voices declined by a third as seen in the data presented in the following table:

Table 3: Newspaper Outlet/Voice Decline

	Outlets		Voices	
Market Group	Decline Rate	1922 to 1967	Decline Rate	1922 to 1967
Top 10	- 19%	205 to 166	- 38%	197 to 122
Top 25	- 17	302 to 250	- 34	288 to 189
Top 50	- 17	450 to 375	- 34	434 to 288
Top 100	- 18	635 to 519	- 33	603 to 403

Source: Appendix Tables B-1 and C-1

The erosion of newspaper outlets and voices is remarkably similar in all market groups of the top 100, with little variation except for the increase in concentration in the top 10 SMSAs.

B. Ownership: General

7. The most important single hypothesis in the study is rejected; there has *not* been an increase in concentration of ownership in daily media in the top 100 SMSAs since 1950. The total proportion of concentration (voices to outlets), as seen in Table 4, has never gone over a third of all media and, indeed, has dropped slightly since 1950:

Table 4: Media Concentration

Market Group	1922	1930	1940	1950	1960	1967
Top 10	.06	.12	.16	.30	.29	.28
Top 25	.08	.12	.18	.32	.29	.28
Top 50	.06	.10	.20	.32	.29	.29
Top 100	.06	.09	.21	.32	.30	.30

Source: Appendix Table A-1

Although the proportions vary a point or so, there is no significant difference between the top 10, top 25, and top 50 markets—all "peaked" in 1950 and have dropped slightly since then, at no time going over a third of all media. The reasons for this pattern are numerous but probably most important is that opportunities for new owners in broadcasting have expanded faster than daily newspaper opportunities have declined. Since 1950, AM, FM, and TV stations have increased by large percentages (see Table 2), while the total number of daily newspapers has declined by 18%. As broadcasting, with technical limits on its expansion, has grown, while newspapers, without such limitations, have declined, it would appear media

economics is the key factor in media growth or decline. While broadcasting has developed two new services since World War II (FM and TV), newspapers have had no corresponding technical break-through, and the resulting decline has led to greater concentration in the press (Table 3) than in broadcasting (see paragraph 8).

C. Ownership: Broadcasting

8. Paralleling overall daily media ownership, concentration in broadcasting has not increased since 1950, and indeed has declined slightly as is seen in the following table:

Table 5: Broadcasting Concentration

Market Group	1922	1930	1940	1950	1960	1967
Top 10	–	.02	.02	.34	.28	.28
Top 25	–	.03	.04	.33	.29	.27
Top 50	–	.02	.04	.32	.28	.27
Top 100	–	.01	.06	.28	.27	.27

Source: Appendix Table A-1

Prior to 1941, there was little concentration because all stations were AM and in almost no case did one owner have more than a single outlet in the same market area. With the post-war rise in FM and television, AM station owners were naturally some of the first to build the new services—thus leading to the major spurt in concentration evident in 1950. As television growth was "frozen" for a few years after 1948, and FM had

peaked and begun to fall before 1950, neither medium had grown large or fast enough by that time to allow major independent (from AM control) growth. By 1960 however, nearly eight years from the end of the television "freeze," TV stations had grown from 103 outlets in 1950 to 352, and FM, which had been in decline during most of the 1950s, was on the rebound and nearly doubled in size from 354 to 673 outlets. The growth trend in both services (as well as AM) continued to 1967 with an increasing amount of this growth being due to independent owners. The implications of all this is important: an increase in (1) types of service, and/or (2) number of channels for each type, will accomplish by normal business market competition what the Commission now proposes to accomplish by rule-making. The proportion of concentrated owners in the top 100 markets went up sharply from 1940 to 1950 simply because old-line AM operations were able to act faster than newer voices in the field. Thus 1950 can be seen as the high-water mark of broadcasting's "old order" for after that date many new voices entered the three services. The slight decline in concentration since 1950 is due mainly then to the steady availability of economically-viable channels in three different services which allowed new blood to enter the business. FM and UHF television especially helped provide expansion room for broadcasting as desired AM and VHF television channels filled up. At present, however, the number of available channels (technically and economically available) in the top 100 SMSAs is dwindling so that it's likely that only owners with the resources of concentrated buying power will be able to pay the increasing costs of station purchase brought about by heightened competition for the few remaining channels. Future technological breakthroughs

may change this outlook, but that is beyond the scope of the present report.

9. As can be seen in Table 6, independently-owned broadcast outlets and multiple-owned broadcast outlets have maintained a steady balance since 1960 after independent stations overtook multiple stations in the 1950s.

10. Unlike outlets, there is a significant difference in independent vs. multiple broadcast voices because the former has grown while the latter has declined (though again, most of that trend came in the 1950s and status quo has been maintained since 1960) as is seen in this table:

Table 6: Broadcast Independent/Multiple Owners

	Outlets			Voices		
Market Group	1950	1960	1967	1950	1960	1967
Top 10	.37:.63	.50:.50	.50:.50	.55:.45	.69:.32	.69:.31
Top 25	.40:.60	.48:.52	.50:.50	.53:.43	.62:.35	.68:.32
Top 50	.43:.57	.50:.50	.51:.49	.57:.41	.67:.32	.69:.31
Top 100	.48:.51	.51:.48	.49:.50	.60:.37	.68:.31	.67:.32

Source: Appendix Tables C-1 (Outlets), and B-1 (Voices). In ratios, independent proportion shown first. Figures may not add to 1.00 due to rounding of sub-totals.

Looking at data for outlets, it can be seen that independent (single-station) owned outlets have increased their position to equality with multiple-owned outlets in the top 10 and top 25 markets, whereas in markets 51-100, the situation has remained relatively stable throughout the period. On the other hand, data for voices shows relative growth of independents over

multiples in all market groups, though the rate of growth for independents was again sharpest in the top 50 markets. Clearly, while the total number of broadcast voices is going up, the number of outlets which constitute one multiple voice are also going up as there are far more AM-FM and ratio-TV combinations in 1967 than there were in 1950. The concentration proportion (see paragraph 8, above) however, has remained constant between voices and outlets of both kinds.

11. The proportion of newspaper-controlled broadcasting outlets has decreased sharply in recent years after a 1940-1950 peak as seen in Table 7. The concentration of newspaper interest has a double peak because (1) in 1940 AM channels then thought technically and economically available were dwindling fast and newspapers had moved into radio heavily in the 1930s so as not to be left out in the technological change in news reporting methods, and (2) in 1950 many of the early FM and TV outlets came under control (especially of those paper with controlling interest in AM stations) for the same reason—to protect themselves against technological change. Newspapers seem to have been especially active in markets 26 and below as is seen in the following table:

Table 7: Newspaper Control of Broadcast Outlets

Market Group	1922	1930	1940	1950	1960	1967
Top 10	.04	.07	.16	.18	.09	.06
Top 25	.08	.11	.21	.20	.08	.07
Top 50	.12	.07	.21	.21	.09	.07
Top 100	.09	.07	.23	.21	.11	.07

Source: Appendix Table C-1.

12. The rate of decline of newspaper-controlled broadcasting voices has been even more pronounced, so that by 1967, the press was a very minor ownership category in broadcasting as is seen in the following table:

Table 8: Newspaper Control of Broadcast Voices

Market Group	1922	1930	1940	1950	1960	1967
Top 10	.09	.07	.17	.15	.07	.04
Top 25	.09	.10	.21	.21	.06	.04
Top 50	.06	.07	.21	.19	.06	.04
Top 100	.05	.07	.23	.19	.08	.05

Source: Appendix Table B-1.

With the obvious exception that the actual numbers are smaller, the pattern and rate of decline is similar to that of newspaper-controlled outlets.

13. As is seen in Table 9, the proportion of group and conglomerate control of broadcasting outlets has increased in recent years after an earlier peak:

Table 9: Group-Conglomerate Control of Broadcast Outlets

Market Group	1922	1930	1940	1950	1960	1967
Top 10	.16	.17	.40	.25	.35	.40
Top 25	.10	.11	.40	.19	.32	.37
Top 50	.05	.10	.45	.17	.31	.36
Top 100	.02	.06	.39	.14	.29	.33

Source: Appendix Table C-1.

The initial 1940 peak in group owners is explained by the height of pre-war AM competition among networks and other groups trying to get solid positions in radio before all available channels were gone—a position very much like that faced by newspaper owners (see paragraphs 11 and 12 above). The decline in 1950 is harder to explain—it was likely due to the new services (especially FM) which many groups were not eager to enter at first. Since 1950, however, group-conglomerate control of radio-TV outlets has increased in all market groups by a factor approaching two in the smaller markets. Noting overali proportions, however, it is clear that unlike newspaper owners, groups and conglomerates prefer the larger markets.

14. The following table shows the increase in group and conglomerate control of broadcast voices on a pattern much like that just described:

Table 10: Group-Conglomerate Control of Broadcast Voices

Market Group	1922	1930	1940	1950	1960	1967
Top 10	.15	.15	.37	.18	.29	.32
Top 25	.09	.09	.39	.15	.27	.30
Top 50	.04	.09	.42	.14	.27	.31
Top 100	.05	.07	.41	.12	.25	.30

Source: Appendix Table B-1.

We see here that groups and conglomerates account for a third of all owners in the top 100 markets, and that the position of groups and conglomerates has increased by a factor of two in all market groups except the top 10.

For discussion of the 1940 peak and 1950 decline, see paragraph 13 (just above). A word of caution is advised here: the FCC proposed rule-making will not directly affect this particular ownership group. Many of these groups and conglomerates control only one station in a market—but they have outlets in many different markets. Only those groups with more than one full-time station in any given market would be affected by the rule-making, and it is likely that forced to sell in one market will encourage them to buy a single station in another—thus expanding the group's influence, but in a different area.

15. As is seen in the following figures, there is little doubt that AM-FM combinations have been of far greater importance numerically in the top 100 markets than have radio-TV combinations:

Table 11: Growth of Broadcast Voice Combinations

	1950		1960		1967	
Market Group	AM-FM	R-TV	AM-FM	R-TV	AM-FM	R-TV
Top 10	66	26	72	37	86	46
Top 25	100	44	113	75	155	78
Top 50	153	65	159	130	238	134
Top 100	228	84	215	218	356	215

Source: Appendix Table B-1.

In 1950, because television was slower to develop initially than was FM (because of the four-year freeze on TV applications and the greater costs involved with television), AM-FM combinations outnumbered radio-TV combinations by more than two to one in all market groups. TV growth by 1960 had narrowed the gap somewhat (because FM had declined through most

of the 1950s), but FM growth in the 1960s widened the gap again by 1967.

D. Media and Population Growth

16. Media outlets have increased at a faster rate than population as is seen in the figures in the following table which shows the number of media outlets available per 1000 people in each market group. Larger figures indicate more outlets per 1000 people.

Table 12: Media Outlets Per 1000 Population

Market Group	1920	1930	1940	1950	1960	1967
Top 10	.018	.014	.011	.016	.018	.019
Top 25	.024	.016	.013	.018	.022	.022
Top 50	.026	.018	.016	.024	.028	.029
Top 100	.028	.021	.020	.031	.036	.040

Source: Appendix Table A-1.

A familiar pattern repeats itself here—the rapid filling up of then-available AM channels led to a decline in outlets-per-thousand by 1940 while the opening up of new FM and TV services after the war has lead to steadily increasing numbers of outlets rising faster than population increases. The rate of growth has slowed considerably, by the 1960s however, as available channels are technically and/or economically filled up. It is likely that by the early 1970s—if not by 1970—that these outlet-per-thousand figures will turn down again for the first time since 1940.

17. Media voices have also increased faster than population growth as is seen in the figures in the following table which show the number of voices-per-thousand population:

Table 13: Media Voices Per 1000 Population

Market Group	1920	1930	1940	1950	1960	1967
Top 10	.017	.012	.010	.011	.013	.014
Top 25	.022	.014	.011	.012	.015	.016
Top 50	.026	.013	.014	.016	.020	.021
Top 100	.027	.017	.017	.020	.025	.028

Source: Appendix Table A-1.

Clearly, the multiplicity of media voices has increased at a faster rate than population growth in the top 100 SMSAs—a healthy trend. The rate of voice-per-thousand increase has been highest in the smaller markets.

Conclusions

From the information presented on the previous pages, it would appear that the FCC proposed rule making is ill-advised, at least at this time. Past trends in market media concentration do not suggest the need for such a ruling, and in many cases show the normal practices of business competition are accomplishing the same thing . . . diversification of media voices.

Inherent in this report, however, is a warning addressed primarily to the Commission. As can be seen

in several of the results above, as long as there were channels which could be utilized technically *and* economically, the broadcast medium expanded and continued to diversify. When those channels became scare, however (as in 1940 and in the early 1970s), monopoly ownership within and between markets became an increasingly stronger factor in the industry. The lesson to be noted is easy to state and hard to act on—as long as sufficient channels can be made available for expansion of service, monopoly within markets should not become a problem in broadcasting Defining "sufficient channels" is beyond the scope of this report but logically it would mean a few available channels in each service in each area. Once the technical limits of existing services have been reached, this safety cushion is obviously lost, leaving two possibilities: (1) initiation of new media services to allow new voices to enter each market, or (2) rulings to artificially enforce diversification *if* such diversification is proved to be necessary to the medium's well-being, and *if* such diversification is not forthcoming from the industry itself. Under possibility two, the two "if" clauses are of critical importance. This report has shown that thus far diversification *has* been developed within the industry as far as in-market voices are concerned. Proof of the good effect of a diversification policy instituted by government, however, will be a good deal more difficult to accomplish, because of the need to show its necessity to the medium's well-being and service.

As this study has dealt in detail with broadcasting, specific recommendations concerning newspapers are not included. Suffice it to say here that the minor role newspapers are playing in broadcasting today would seem itself to obviate any need for prevention of their

ownership of broadcast stations. The importance of their role in radio-TV has declined so far in recent years that their right to have a broadcast license as much as anyone else should far outweigh any policy to the contrary.

Finally, it must be remembered that media voices means just that—*all* media and not just broadcasting or newspapers. This study has reported on only part of all the media available in each of these markets. Even in that part (all daily mass media originating within the SMSA) however, there is a clear multiplicity of voices to be heard giving news and entertainment each day. When you add in other media originating within most of these SMSAs plus the many media received in but not originating in each market, the variety of voices and points of view heard is almost numberless.

[Robbins, "A Study of Pioneer AM Radio Stations and Pioneer Television Stations," (April 1971) (NAB Exhibit D), pp. 1-21]

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I. THE PROJECT

Impetus For The Project. During the summer of 1970 the National Association of Broadcasters realized a need for historical data on the affiliation between broadcasting stations and newspapers. The researcher who writes this report was known to have lived through and to have participated in the early years of broadcasting in the United States and since that time to have engaged in the training of broadcasters and in teaching the history of that industry. He welcomed the opportunity to assemble the desired information from the government files. As a consequence, the study on which this report is based was initiated.

Objectives Of The Project. The desire to obtain the factual record of newspaper participation in American broadcasting gave the impetus to this study. However, it was soon realized that the history of newspaper participation in the industry became meaningful only when that information was viewed in its relationship to the history of all other broadcasting ownership interests. In other words, newspaper affiliated stations should not be lifted out of context for scrutiny but must be studied within the frame work of the total broadcasting picture if conclusions of significance are to be reached. Thus, the objectives of this study were to determine: (1) the business and/or social affiliations of the licensee who originated each broadcasting facility and (2) the changes of such affiliations as the actual ownership - not necessarily the licensee name - changed through the years.

Since the United States broadcasting system consists of two types of transmission, radio and television, this present study traces the actual and affiliated ownership patterns of television as well as those of AM radio stations.

Scope Of The Project. The National Association of Broadcasters had a deadline to meet in utilizing the materials that were to be forthcoming from the study. The researcher had a predetermined, limited amount of time to spend in Washington searching the records. These two time considerations dictated the final scope of the project.

It was decided that histories of the pioneer radio and television stations would yield the most valuable information and that this study should be limited to a consideration of the ownership patterns as they developed with these original stations. Pioneer radio

stations were defined as all stations which went on the air prior to 1935 - those stations which were authorized before the Federal Communications Commission was put into operation. Pioneer television stations were defined as those which went on the air, or which were authorized, prior to the Federal Communications Commission's 1948 freeze on the activation of television channels.

The ownership of the pioneer radio stations was traced from the date of origination to 1950-51, a span of from twenty to thirty years, or a period roughly comparable to the entire life span of the pioneer television stations. Although it had been the original intent to carry the search of the radio station files up to 1970, the unrelenting deadline forced the search to be halted at 1951. The histories of the pioneer television stations were traced from their origination dates to 1970.

II. SOURCES OF MATERIALS

Practically all of the data on the pioneer radio stations was taken from the records of the Department of Commerce, the Federal Radio Commission and the Federal Communications Commission which are stored in the Federal Records Center at Suitland, Maryland. Some of the information also came from the 1970 BROADCASTING *Yearbook*. The data for the pioneer television stations was gathered from the active Federal Communications Commission files in Washington, the inactive files in the Federal Records Center in Maryland and a brief history of pioneer television stations published in the November 2, 1970 issue of BROADCASTING.

III. METHODOLOGY

The research procedures and organizational plan of this study evolved slowly over a period of more than two months. They were dictated by the accessibility of the federal records and the system under which those records are stored.

It was initially believed that all of the ownership information would be almost instantaneously available in the Reference room of the Federal Communications Commission in Washington. The records in that reference room do reveal licensee names but they do not reveal the ownership of corporate licensees. This information up to 1961 is to be found only in the inactive, stored files of the Federal Communications Commission. So the determination was made to study these files - a set of folios for each station containing the CP and license applications, correspondence, engineering data, inspector's notations, etc. - in order to discover the actual individual(s) or organizations - not legal entities - who owned and were licensed to operate a broadcasting facility on any given date.

In many cases even the files did not readily yield the desired information. The early government regulatory agencies - the Department of Commerce and the Federal Radio Commission - did not insist that applicants indicate their regular business interests. Innumerable applicants were amazingly casual about the manner in which they answered application questions. It was found that applications frequently were missing from folios. Consequently, the information sought was sometimes found in correspondence, in reports on FCC and FRC hearings, even on the letterheads of the correspondence.

It was erroneously assumed that the complete files for each station from origination to 1970 could be examined in the reference room of the Federal Communications Commission in Washington. However, the records for each subject radio station consists of a minimum of six, possibly as many as seven or eight folios, some as much as three inches thick. With over six hundred radio broadcasting stations under consideration, not to mention the one hundred plus television stations, it would have been necessary to transport to Washington from the Suitland, Maryland, Records Center a minimum of three thousand separate folios. Obviously, this procedure was not feasible and it so became apparent as the researcher waited for more than six weeks for files to be delivered to the Washington reference room. Only a comparatively small number of about forty out of the more than four hundred complete files for which call orders were placed in the early stages of the investigations arrived at the FCC reference room from the Maryland Records Center. Therefore, when authorization was proffered him to conduct his research at the Federal Records Center in Suitland, he accepted with alacrity.

The researcher's wife joined him when the move to Suitland was made. For several weeks the two worked in the search room of the Records Center where folios were brought to them from the stacks. Eventually they were accorded the privilege of working in the stacks. This proved to be a major milestone in the project.

Access to the stacks enables one to comprehend the complex system which has been developed for effectively storing and keeping track of literally millions of government records. It is only when one understands this system that an effective search plan can be

designed, one which is practical and efficient in terms of the shelving, reshelving, and transporting involved.

It was learned that station files are shelved in the Record Center according to dates, not call letters. Thus, the six to eight folios which comprise the complete file for any given station are not shelved together. Rather the folios of all stations which contain materials covering a given period of years are boxed and shelved together. This grouping is technically known as an accession. For example, all the files of the Commerce Department and the subsequent ones of the Federal Radio Commission covering the years up through 1934 are packed away in sixty-three cardboard boxes catalogued as Accession Number 54-A-145. The period of 1934 to 1961 is divided into four eras - or accessions - each stored in a different area of the one acre stack room in the Records Center.

It appeared that the speediest and most direct means of examining the files was to search the folio(s) for every station under consideration contained in one accession and then move on to the next and then to the next. If the folios of each station were to be pulled in chronological order, as they had previously been, an appreciably greater amount of time and effort would go into the pulling alone. So it was decided to adopt the accession plan of searching the files. The obvious drawback to this method was the formidable task of assembling into a chronological continuum notes which were taken piecemeal and days or weeks apart. Especially was this true when a folio in one of the accessions was lost or checked out, and there were resultantly no notes for that span of years. As of this writing, with the advantage of hindsight, the researcher is uncertain which method of studying the files - by

accession or chronologically by stations - would actually have been speedier.

Searching by accession did make it possible to trace the ownership histories of all stations uniformly, discontinuing the search at whatever date time demanded without affecting the validity of the sample. A chronological search pattern would not have provided such flexibility in the span of years covered, but would have necessitated narrowing the number of stations studied.

The first accession containing the original folios of stations that went on the air through 1934 provided the basic list of radio stations for this project. Occasionally FRC-FCC hearing reports and station applications revealed information on early stations whose folios were missing. These latter were added to the basic list of stations whose histories were to be traced.

The researching of the ownerships of the pioneer television stations was simple as compared with the researching for the ownerships of the pioneer AM radio stations. The histories of these pioneer telecasting stations as set forth in the November 2, 1970 issue of BROADCASTING were checked against the folios of these same stations in the inactive files at the Federal Records Center in Maryland and in the active files in the reference room of the Federal Communications Commission in Washington.

With these television stations only the newspaper and radio affiliations were specifically traced. No attempt was made to determine businesses, other than newspaper publishing and broadcasting, in which the licensee might be engaged. There was not the diversity of individuals, businesses and "societies" involved that

there had been with the development of radio broadcasting. Television is a costly enterprise. It could not be undertaken as a whim, a hobby or a speculative adjunct of a prospering business. The tables that will be found in the FINDINGS section of this report indicate the information that was sought in reviewing the files of the pioneer television stations.

IV. THE FINDINGS

As has been explained earlier one of the prime goals of this project was to ascertain the commercial and/or social organizations which, in the pre-FCC years, were moved to experiment with the use of radio broadcasting or the "radiophone" as it was first known. It is obvious that there is a natural affinity between broadcasting and certain types of business enterprises; newspaper publishing, for instance. But actually, who nurtured these early radio stations through their fledgling years? As broadcasting developed, did the type of licensee change? Did the ownership tend to remain more constant among certain types of licensees? Or in certain parts of the country? The data gathered in this project has been tabulated in such fashion as to lend itself to analysis in answering these questions and others. But the researchers have made no effort to interpret the collected data.

One generalization is justified. Many a pioneer licensee who ventured into radio broadcasting as an advertising adjunct to his primary business, eventually abandoned that business in favor of becoming a full-time broadcaster. Many of the names which appear on construction permit and license applications through the years, first in one locale and then in another,

identify individuals whose first radio broadcasting venture was for the purpose of publicizing activities so diverse as a real estate development, a threatre, a church, a creamery, a newspaper, – even a national guard unit.

In the process of preparing Table II, it was necessary to decide how to compute this changing ownership. When should a station be reclassified from *hotel, music store, minister,* etc. to *broadcasting company*? It was decided by the researchers that, even though no actual change of ownership had taken place, when the original licensee applied for a license renewal after 1930 under a corporate name different from that of the original licensee, the station should be credited to *broadcasting company* rather than to the originating category.

There was one exception to the above rule. The researchers were especially interested in newspaper ownerships of stations. Hence, when a station had any affiliation whatsoever with a newspaper, that station was credited to *newspapers* in the tabulations.

In some instances a radio station was launched and maintained through the efforts of two disassociated organizations. For instance, in New Orleans the license of WSMB during the period through 1951 was issued jointly to a department store and a theatre organization. In such cases the subject station has been credited to two categories in Tables I and II. The WSMB example is, of course, exceptional. More often one of the originating businesses dropped out of the operation. Also some comparatively few stations, as the Industry developed, were combined, abandoned, or deleted. Due to these circumstances, it should be understood that the totals of the various categories cannot be reconciled with the total number of stations under consideration.

In Table I the original ownership of the pioneer radio stations has been matched with sixteen types of commercial or social ventures. In Table II subsequent ownership in the years 1927, 1934, 1945 and 1951 has been categorized in the same fashion. In order that the reader may utilize the tables in a meaningful manner the categories as defined by the tabulations are here presented:

Newspapers:

Newspaper publishing company under corporate name owning all or part of the broadcasting operation.

Stockholder of publishing company owning all or any stock of broadcasting operation and serving on board of directors of broadcasting operation.

Individuals:

An individual, a partnership of two individuals, a family corporation where approximately 90% or more of the stock held by the same family over a period of years. In other words, an individual enterprise, as opposed to a group investment.

Educational Institutions and Organizations:

Educational institution or instructional organization of any kind:

Colleges and universities
Public schools
Specialized educational ventures such as:
Institutes for training broadcasting technicians.
Academy of dance.

Radio Receiver Sales and Service:

Retail establishment that sells-services radio receivers:

Radio receivers may be sole business.
Principal business may be music, furniture, hardware, with radio receivers as one of items for sale.

Electrical Services and Supplies:

Electrical Equipment manufacturers:
General Electric, Westinghouse, Grebe, etc.
Electrical contractors
Battery manufacturers, suppliers, servicers:
Willard, National, etc.
Automobile services.

Religious Organizations - Individuals:

Churches, Bible classes, ministers, etc.

Educational institutions supported by religious organizations not included. Such educational institutions are placed in the *Educational* category

Broadcasting Companies:

Any group of people, incorporated or unincorporated, who have pooled their resources, sometimes their efforts, for the purpose of operating a broadcasting station.

Department Stores and Automobile Dealers:

Self-explanatory.

Advertising Agencies - Amusement Organizations:

Advertising agencies: self-explanatory
Amusement Organizations: Theatre and Amusement Park Operators, Talent Booking Agencies, Film Distributors.

Hotels:

Self-explanatory.

Utility Companies:

Telephone Companies, Electric Power Companies.

Agriculture:

Seed and nursery companies, hatcheries, grain exchange, etc.

One agriculturally oriented type of business was excluded from this category and credited to *newspapers,* i.e., farm journals and newspapers.

Fraternal - Civic Organizations:

Lodges: Moose, Elks, etc.
Chambers of Commerce, Radio Clubs, Political Party.

Medical-Health Organizations/Individuals:

Hospitals, Medical Doctors, Opticians, Osteopaths, Chiropractors

Government Agencies:

Municipalities
National Guard units

Insurance Companies:

Self-explanatory.

Miscellaneous:

Mostly one of a kind - never more than three.
For instance:
A bakery
A creamery
A playing card company
A tobacco company
A woolen mill
2 flour mills
3 oil companies

AM RADIO STATIONS ORIGINATED BETWEEN 1920 AND 1934 BY YEAR OF LICENSING AND BY CATEGORY OF LICENSEE

CATEGORY	Number of Stations Originated In: 1920	'21	'22	'23	'24	'25	'26	'27	'28	'29	'30	'31	'32	'33	'34	Total all years
Newspapers		1	21	5	2	1	3	2	1	2	1			1	2	42
Individuals	1	1	17	3	12	18	21	17	7	7	3	3	4	2	3	119
No business nor occupation indicated in files.																
Educational Institutions and *Organizations*			31	9	3	5	2	2	1							53
Radio Receiver Sales and *Service*			12	1	8	5	9	9	2	1	3	2		1		59
Electrical Services and *Supplies* Independent of radio receiver merchants	1	1	15	6	4	13	11	3	1	1				1		58
Religious – Organizations – Individuals – Excluding educational institutions			5	5	7	9	5	1	1				1		1	38
Broadcasting Companies			3		2	1	7	1	3	3		2	2	1	3	34
Department Stores and *Automobile Dealers*			12	2	3	7	3								1	28
Adversting Agencies – Including Amusement Organizations			1	2	1	6	1	1			1					16
Hotels					3	5	3				1					12
Utility Companies		1	5	1	2		3									12
Electric Power-Telephones																
Agriculture – Organizations or businesses associated with			2	1	2	3	1									11
Fraternal – Civic Organizations			2		2	3	3									10
Medical-Health Orgs/Indivs.			1	2	1	1	2	1								8
Government Agencies					2	1	2									5
Insurance Companies				1	1	2				1						5
Miscellaneous		1	4	1	3	10	1	3	2	1	2					28
TOTALS	2	3	131	42	58	95	80	47	18	19	11	7	7	6	10	526

AM RADIO STATIONS ORIGINATED PRIOR TO 1935 BY OWNERSHIP CATEGORIES IN YEARS 1927, 1934, 1945, 1951

Category	1927	1934	1945	1951
Newspapers	43	95	141	138
Individuals	61	100	87	84
No business nor occupation indicated in files.				
Radio Receiver Sales and *Service*	20	14	4	3
Electrical Services and *Supplies* Independent of radio receiver merchants	41	17	7	6
Educational Institutions and *Organizations*	49	33	29	32
Religious – Organizations and *Individuals*	27	14	9	8
Excluding educational institutions				
Broadcasting Companies	39	161	141	144
Department Stores and *Automobile Dealers*	18	7	8	6
Advertising Agencies – Including Amusement Organizations	8	9	8	2
Hotels	12	6	2	1
Utility Companies – Electric Power and Telephones	8	3	1	—
Agriculture – Organizations or businesses associated with	5	5	—	—
Fraternal and *Civic Organizations*	10	1	1	2
Medical-Health Organizations/				
Individuals	8	1	1	1
Government Agencies	8	6	5	5
Insurance Companies	5	9	8	8
Miscellaneous	14	8	4	4

CONTINUITY IN OWNERSHIP OF PIONEER AM RADIO STATIONS

Of 638 pioneer AM Radio Stations - stations originated between 1920 and 1934:

A. Number of original licensees still operating those facilities in 1951: *107*

B. Number of licensees who owned-operated stations for 20 consecutive years or more during the period 1920 to 1951: *182*

The licensees in *B* fall into three categories:

1. Licensees who purchased stations already on the air and who continued to operate these purchased stations for 20 consecutive years or more.
2. Initial licensees-operators who operated their stations for 20 consecutive years - or more - but who relinquished the licensees for their stations prior to 1951.
3. Original licensees who continued to operate their stations through 1951. Hence, the 107 licensees in *A* above are a part of the 182 in *B*.

INVOLVEMENT OF NEWSPAPERS IN AM RADIO STATION PIONEERING

Of 638 pioneer AM Radio Stations during period 1920 to 1934:

A. *Number of newspapers putting stations on the air:* *40*

B. *Number of newspapers maintaining their radio interests through 1951:* *27*

C. *Number of newspapers relinquishing their interest:* *13*

2 in less than 1 year
4 after 3 years
2 after 4 years
1 after 5 years
1 after 6 years
1 after 13 years
2 after 22 years

D. *Number of newspapers purchasing interests in operating radio stations:* *178*

In stations less than 1 year old:	12
In stations 1 to 5 years old:	33
In stations over 5 years old:	133

E. *Of the 178 newspapers which purchased interests in operating stations, number relinquishing interests:* *38*

After 1 year of ownership:	1
After 2 years of ownership:	5
After 3 years of ownership:	3
After 4 years of ownership:	3
After 5 years of ownership:	4
After 6 years of ownership:	4
After 7 years of ownership:	2
After 8 years of ownership:	4
After 9 years of ownership:	3
After 10 years of ownership:	1
After 11 years of ownership:	1
After 12 years of ownership:	1
After 13 years of ownership:	3
After 14 years of ownership:	1

After 15 years of ownership: 1
After 19 years of ownership: 1

F. *Number of newspapers interested in radio stations whether interest was (1) through origination or through (2) purchase:* . . . *218*

OWNERSHIP PATTERNS OF PIONEER TELEVISION STATIONS

The following tables are based on the pioneer television stations, those that had been put in operation - or which had construction permits - prior to the Federal Communications Commission's freeze on the activation of channels, 1948-1952.

Pioneer Television Stations: *106*

Originated By:

A. *Newspapers with no experience in operating broadcasting facilities:* *3*

B. *Newspapers with experience in operating broadcasting facilities:* *29*

C. *Broadcasting operations, ordinarily AM radio stations:* *57*

D. *Organizations - or indivduals - with no experience in broadcasting and with no connection with newspapers:* *17*

Number of operations which changed ownership during period from origination date to 1970: *43*

A. *Number of stations that changed hands during:*

First *5 years* on the air – *25* stations
5 to 15 years on the air – *15* stations
15 to 20 years on the air – *3* stations

B. *Numbers of times stations changed hands:*

1 ownership change – 25 stations
2 ownership changes – 10 stations
3 ownership changes – 7 stations
4 ownership changes – 1 station

Of the 32 newspaper originated stations:

Number of operations which changed ownership during period from origination date to 1970: *6*

Number of Times stations changed hands:

1 ownership change – 2 stations
2 ownership changes – 1 station
3 ownership changes – 3 stations

Of the 74 originated stations not connected with newspapers:

Number of operations which changed ownership during period from origination date to 1970: *36*

Number of times stations changed hands:

1 ownership change – 23 stations
2 ownership changes – 8 stations
3 ownership changes – 4 stations
4 ownership changes – 1 station

COMPARATIVE LICENSE RELINQUISHMENT RATIOS

Relinquishment Rate	FOR:
	NEWSPAPER ORIGINATED STATIONS 32
18 3/4%	6 newspapers relinquished original license by 1970
	26 newspapers still held original license in 1970
	NON-NEWSPAPER ORIGINATED STATIONS 74
	***Originated by Broadcasters* 57**
38 2/3%	22 had relinquished original license by 1970
	35 continued to hold original license in 1970
	***Originated by Independent Enterprises:* 17**
82 1/3%	14 had relinquished original license by 1970
	3 continued on original license in 1970
	All Non-Newspaper Originated Stations
58 2/3%	36 non-newspaper stations had relinquished original license by 1970
	38 non-newspaper stations continued to hold original license in 1970.

[Comments of ANPA (April 2, 1971), pp. 54-58]

VI.

THE COMMISSION'S ASSERTED OBJECTIVES OF PROMOTING DIVERSIFICATION OF VIEWPOINTS AND ECONOMIC COMPETITION IN LOCAL MARKETS CAN BEST BE ACHIEVED ON AN *AD HOC* BASIS

As seen in the preceding section, the Commission's proposed rule would, in effect, sacrifice stable, well-operated stations owned by newspapers with close community ties in return for highly speculative and at best nominal increases in diversity in specific local markets. Affirmative public interest disadvantages of the proposed rule include substantial risks to continued local ownership of broadcast stations. Furthermore, problems of concentration of control on a nationwide basis, as well as conglomerate and absentee ownership of broadcast stations, would undoubtedly become more serious if the Commission's divestiture requirement were approved.

ANPA is convinced that diversity of viewpoints and economic competition in local markets can be better achieved through means less drastic than the extreme and unrealistic measures proposed by the Commission. And, since these means are less restrictive of First Amendment rights and less likely to frustrate achievement of other important communications policies, constitutional principles, as well as the public interest, demand that the Commission abandon the proposed rule.

A. The Commission Should Continue to Apply Its Present Policy of Considering Newspaper Applications for Broadcast Stations on an *Ad Hoc* Basis

As amply demonstrated in the preceding section, the primary defect of the Commission's proposed rule is its failure to take into account the variable and often unique conditions prevailing in individual local markets. No two broadcast or newspaper markets in the United States are identical. Each market has its own distinct geographical, social, and economic characteristics, and any attempt by the Commission to fashion a rule of general applicability in an area so peculiarly dependent on the facts of each situation is foredoomed to failure. It is for this reason that the Commission has traditionally considered newspaper ownership as only one factor among many in determining whether to grant a broadcast application. The most authoritative statement of that policy is found in the Public Notice terminating the 1941 newspaper investigation. There, the Commission said:

> "All the Commissioners agree to the general principle that diversification of control of such media is desirable. The Commission does not desire to discourage legally qualified persons from applying for licenses, but does desire to encourage the maximum number of qualified persons to enter the field of mass communications, and to permit them to use all modern inventions and improvements in the art to insure good public service.
>
> "In the processing of individual applications for licenses, the Commission will inquire into and in its decisions give expression to 'public interest' considerations. The Commission does not feel that it should deny a license merely because the applicant is engaged or interested in a particular type of business. However, it does not intend in granting licenses in the public interest to permit concentration of control in the hands of the few to the exclusion of the many who may be equally well qualified to render such public service as is required of a licensee." Memorandum F, Attachment B.

Continuously since the above statement, the Commission has vigorously applied its diversification policy in individual licensing proceedings involving newspaper applicants. In numerous comparative hearings the Commission has awarded station licenses to the non-newspaper applicant;[40] and even in non-comparative proceedings, the Commission has denied applications of newspaper owners where anti-competitive conditions or practices were established after a hearing.[41] Similarly, the Commission has regularly considered any apparent problems of concentration and diversification prior to approving assignment and transfer applications.[42] And, in cases of alleged abuses resulting from newspaper ownership of local broadcast stations, the Commission has at times chosen to test the

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[40] *See, Southern Tier Radio Service, Inc.*, 3 R.R. 211 (1946); *Observer Radio Co.*, 3 R.R. 234 (1946); *Voice of Augusta, Inc.*, 3 R.R. 590 (1946); *WBNX Broadcasting Co., Inc.*, 4 R.R. 205 (1948); *Scripps-Howard Radio, Inc.*, 4 R.R. 525 (1948), *aff'd, Scripps-Howard Radio, Inc. v FCC*, 189 F.2d 677, *cert. denied*, 342 U.S. 830 (1951); *McClatchy Broadcasting Co.*, 9 R.R. 1190 (1954), *aff'd, McClatchy Broadcasting Co. v FCC*, 239 F.2d 15 (D.C. Cir. 1956), *cert. denied*, 353 U.S. 918 (1957).

[41] *Fostoria Broadcasting Co.*, 3 R.R. 2014a, *aff'd sub. nom., Mansfield Journal Co. v. FCC*, 180 F.2d 28 (D.C. Cir. 1950).

[42] *Grants Broadcasting Co., Inc.*, 3 R.R. 2d 657 (1964); *cf. Times Herald Printing Co.*, 19 R.R. 2d (1970).

validity of such allegations in an evidentiary hearing on license renewal.[43]

In summary, by recognizing the unique characteristics prevailing in each local market, the flexible procedures previously followed by the Commission have been ideally designed to serve the public interest. There is nothing in the record of this proceeding demonstrating the need to abandon this well-established policy of considering newspaper ownership on a case-to-case basis. Neither the Commission nor the Antitrust Division has pointed to the existence of the sorts of abuses which they allege may potentially arise in newspaper cross-ownership of broadcast stations. *See e.g., Times Herald Printing Co.*, 19 R.R. 2d 169, 178j-178p (Commissioner Johnson dissenting). In the absence of such a showing, the Commission should continue to consider any specific questions raised by newspaper ownership of broadcast stations on an *ad hoc* basis.

B. The Commission and the Antitrust Division Possess Additional Regulatory Tools Well Adapted to Achieve Diversification and Economic Competition in the Local Markets

The Antitrust Division and the Commission both possess important means of supplementing the FCC's present policy of considering the effect of newspaper ownership of broadcast stations on an *ad hoc* basis. ANPA believes that these means are better designed to promote competition and diversification than the Commission's proposed anti-newspaper rule.

The first of these regulatory tools is the Justice Department's authority to enforce the antitrust laws. We do not assert that newspaper-broadcast combinations have *never* engaged in practices questionable under

antitrust statutes. In such cases, however, the Justice Department is not powerless to act, and in fact has acted. *See e.g., Lorain Journal Co. v. United States*, 342 U.S. 143 (1951). Espicially in light of the availability of these remedies, ANPA submits that the Commission's proposed rule, which would punish both guilty and innocent without distinction, is inconsistent with the underlying policies of the antitrust laws. *Cf. United States v. Radio Corporation of America*, 358 U.S. 334, 351-52 (1959).

Similarly, the Commission itself is well equipped to guarantee diversity of media voices in the local market by remedies other than the radical surgery proposed in this proceeding. Now, more than ever before, stations are obligated to present all responsible views on matters of public concern. *Red Lion Broadcasting Co. v. FCC*, 395 U.S. 367 (1969). Furthermore, as a recently published memorandum to the Commission from its General Counsel suggests, the full limits of the fairness doctrine following the *Red Lion* decision have yet to be tested.[44] Until it is clearly demonstrated that the

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[43] *Chronicle Broadcasting Co.*, 15 R.R. 2d 993 (1969); *Midwest Radio-Television, Inc.*, 16 FCC 2d 943 (1969).

[44] Mr. Geller suggests that the Supreme Court's opinion may permit the Commission, pursuant to Sections 303(b), 303(r), 307 and 309, to specify minimum percentages of time devoted to various programming categories. Furthermore, he notes that stations may have a duty to respond not only to complaints of unfairness but also to seek out, encourage and implement the expression of contrasting viewpoints and that this duty, as part of the requirement that a licensee operate in the public interest, could provide the basis for license revocation or a cease and desist proceeding (as distinguished from a license renewal hearing). Recent rule makings actions by the Commission indicate its intent to explore these recommendations in depth. *See Notice of Inquiry* and *Notice of Proposed Rule Making*, FCC Docket 19153, February 23, 1971.

fairness doctrine is an inefficacious means of guaranteeing diversity of programming in local markets, the Commission should abstain from attempting a basic restructuring of the broadcast industry.

Finally, the potential for assuring diversity in local markets inherent in the fairness doctrine can be significantly supplemented in numerous ways through the Commission's authority to promote the growth of CATV, communications satellites, and other emerging new modes of communications which hold out the distinct promise of ending forever any "scarcity" of channels of electronic communication. In contrast to broadcasting outlets, CATV systems by their very nature are "diversified" in terms of the services they provide or are capable of providing. At the present time, all such systems carry a number of television stations over whose programming they exercise no control. Upon resolution of the distant signal controversy, they will be able to provide even more television "voices." CATV also has the capability to present a wide variety of informational and entertainment services originating within the system. Twenty channels of CATV service are already a reality, and it has been said that 100-channel systems are in the future. CATV cannot, therefore, be considered a single "voice" in the sense that a radio or television station is. More accurately, it is a conduit for many "voices." By fully exploiting the capabilities of this new medium, optimal diversity in local markets can readily be achieved.

[Comments of the Houston Post Company, et al. (May 17, 1971), pp. 16-25]

THE SEPARATE OPERATION OF THE NEWSPAPER AND BROADCAST STATIONS

31. Nor is the Commission's assumption that increased diversity will automatically be obtained by a divorce of commonly owned broadcast stations and newspapers well founded in this case. The fact is that, in Houston, the KPRC stations and the Post do function as separate entities providing diverse voices that serve the public well. The operation of the stations and the newspaper are completely separate and there is no overlap of operational functions between the newspaper and the stations.[13] The stations are run by broadcasters who have separate operational authority. The newspapers are run by newspapermen who have separate operational authority. The newspapers and the stations function from separate offices and have separate staffs.[14]

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[13] Attachments 3 and 4 are diagrams of the operational personnel and their functions for KPRC and KPRC-TV. They detail the separate functions performed by individual staff members of the two stations and indicate that, for the two stations, there are separate news, sales promotion, public service, programming and engineering departments.

[14] The separation is illustrated by the fact that any advertising for the newspapers carried on the stations is at regular rate card rates. The newspapers sell advertising space to the station at regular rates and both stations' programming announcements are carried with no favoritism being shown. There is no identification with the Post in the stations' announcements and no identification of the stations with the Post in the papers' program announcements. Attachment 5 is the summary and conclusions of a study undertaken by Dr. William Hawes, an

[footnote continued]

32. The duties and functions of professional broadcasters and professional newspapermen are quite different.[15] Different experience and training involved creates a natural (if somewhat competitive) separation between the two professions. For example, the top operational personnel of the stations have extensive broadcast experience, and broadcast experience only. The operational personnel of the newpaper has newspaper experience and newspaper experience only. The total operational separation of the newspaper and stations does result in diversity of viewpoint and different treatment of matters of public concern. For example, development of editorials are the responsibility of the respective managements of the newspapers and stations. This can and does result in different

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associate professor of communications (radio-television-film) at the University of Houston. The study, "A Content Analysis of the Television-Radio Page and TV Week Magazine of the Houston Post," was undertaken "to determine whether the television and radio content of the Houston Post is objective in commenting on television and radio programs." Dr. Hawes' conclusion was "that for the sample periods the Houston Post showed no significant partiality toward KPRC Television or KPRC Radio or the National Broadcasting Company with which they are affiliated. The Television-Radio Page was remarkably objective . . . and TV Week was fair even to rotation of its cover page." The study's summary and conclusions are being submitted with all copies of these comments. However, because of its bulk, a single copy of the underlining data analyzed by Dr. Hawes accompanies the original copy only.

[15]The Commission's conclusion (Notice, para. 32) that "[t]he functions of newspaper and television stations as journalists are so similar that their joint ownership is, in this respect, essentially the same as joint ownership of two television stations" is simply untrue. The study by Professor Wilcox (Comments of the American Newspaper Publishers Association, Volume II, Item C) illustrates clearly the difference of function of broadcast and newspaper journalism.

perspectives as in illustrated by recent editorials on the stations and in the Post. Attachment 6 is a sampling of editorial positions taken by the stations and by the Post and a sampling of editorial positions taken by the stations on which the Post took no position. They clearly indicate an independence of viewpoint.

33. It must, however, be recognized that while broadcast editorializing does contribute to diversity of viewpoint, broadcasters are not free, as are newspapers, to present only their views. The Commission's licensees are obligated to present opposing views each time they take a position on controversial matters. Nor does the assumption upon which the proposed rules rest (*i.e.*, that contrasting viewpoints will automatically result from divestiture) take into account the fact that broadcasters already have a positive obligation to address themselves to the problems of their communities in their programming and, in so doing, a balanced approach which includes contrasting viewpoints is required. Thus, the broadcaster's own views on matters of concern in the community are but one side of the story which he must present and, if he does present his own views, he must present contrasting views in any event. The KPRC stations have always recognized their fundamental responsibility to fairly present contrasting viewpoints.

34. The separate functions of newspapers and broadcasters is also demonstrated in the news area. KPRC Radio News is a separate and independent news organization with its own requirements, needs and goals. It is the oldest broadcast news service in Houston and was the first broadcast news organization in Houston to employ full-time professional journalists and to put its own reporters in the field. It has no

contractual arrangements or editorial liason with the Houston Post. No employee of the Houston Post makes any contribution to the concept or content of KPRC News.

35. As a general rule, KPRC Radio News reports the news on the hour, 24 hours a day. These reports do not include NBC Network news on the hour which supplements the KPRC newscasts. KPRC regularly preceeds the network news on the hour with what it calls a "Hotline" summary of local and regional events. All KPRC radio newscasts are augmented with voice reports from KPRC's own correspondent staff, NBC regional correspondents and newsmen and KPRC Radio News strives to get the voices of local and national newsmakers on the air as often as possible.

36. On the half hour the radio news department gives a three minute summary of world, national and local events. At noon there is a ten minute summary of the day's events until that time. This report includes local, regional, national and world news. Between 4:30 p.m. and 6:30 p.m. the twice an hour newscasts are expanded to five minutes. At 6:00 p.m. there is a ten minute wrapup of the day's events on the local and national scene. The regular twice an hour news schedule then continues until 10 p.m. when there is another wrapup and items are also included which will appear in the next day's headlines. Regular reports continue throughout the night until the morning drive time arrives.

37. Under the direction of the News Director, reporting directly to the General Manager, KPRC Radio News employe nine newsmen. There is a newsman on duty 24-hours a day in the radio newsroom and the news director is available at all times. KPRC Radio

newsmen are chosen for their journalistic qualifications first and, only secondarily, because of their vocal equipment. The background of KPRC's News Director, John N. Davenport, encompasses experience at all levels of broadcast news, including at the local and network level. That experience includes six years at WFAA-AM-FM-TV, Dallas-Ft. Worth; service with the NBC, NET and ABC networks in Washington, D.C., and three years as Western States correspondent for ABC Network News. KPRC Radio newsmen are divided into two groups: inside men and field reporters. The inside newsmen serve primarily as newscaster-editors. Their assignment is to air the twice-an-hour scheduled newscasts, update and follow up running stories and record tapes from outside correspondents. The inside newsmen have a wide range of experience and education, including assignments in major markets. One staff member is a graduate of the Missouri School of Journalism and has more than twenty years of experience. Another staff member has a M.A. in Journalism. Others are continuing their education.

38. Most of KPRC's field reporters are assigned a regular beat. These beats include City Hall, police, politics, business and education. In addition, KPRC Radio has a full time political reporter covering the state legislature in Austin when the legislature is in session. Field correspondents phone in regular reports as events on their beats develop. In addition to the eight field correspondents in Houston, KPRC Radio News has regular contacts in Austin, Dallas, Ft. Worth, San Antonio and all other major Texas cities.

39. The KPRC-TV News Department today is staffed by 19 full time professional journalists, cameramen and technicians. Additionally, KPRC-TV maintains corres-

pondents in Austin and Washington, D.C. The News Director, a native of Texas with 25 years experience in broadcast journalism, has been in the KPRC organization since 1948. He came to the station from a position as News Director of the principal commercial network in Australia. The KPRC-TV News Staff is separate and independent from the Houston Post news staff in every sense and no employee of the Post makes any contribution to the concept or content of KPRC-TV News.

40. The KPRC-TV News Department produces seven news programs every weekday and two news programs each on Saturdays and Sundays. These programs are telecast at 7:25 a.m., 8:25 a.m., noon, 5:00 p.m., 6:00 p.m., 10:00 p.m. and midnight on weekdays, and at six p.m. and ten p.m. on Saturdays and Sundays. The morning news programs are five minute summaries of state and local news. The six p.m. program is a half-hour report on local and state news, with special Sports and Weather Reports. Late or unusual national or international developments are included. The six p.m. Report is devoted mostly to news of Houston and Texas. On an average day, the work of 10 to 12 staff members will be included in this report, "The Scene at Six", which has been anchored for the past 8 years by Larry Rasco who is a verteran of 20 years in broadcast journalism with previous experience in Dallas and San Francisco. "The Scene at Ten" is a half hour newscast of local, regional and national news. It has been anchored by Steve Smith for the past five years. Mr. Smith came to KPRC-TV from ABC-TV in Detroit. It has several times been cited as the best big city TV News Program in Texas by the Texas Associated Press Broadcasters Association.

41. The KPRC-TV News Department has authority and budgetary latitude to cover any news event in Texas or surrounding States. The department maintains a correspondent-cameraman team in Washington and a correspondent-cameraman team in Austin which are in regular contact with Texas and national lawmakers and federal government departments. The KPRC-TV News department is the only television news organization in Texas with its own desk in the State Capitol newsroom, and with its own Washington correspondent.

42. In the renewal applications for Houston television stations filed on May 3, 1971, the percentage of time on the air devoted to news for the four stations was:

KPRC-TV		11.98%
KTRK-TV	(Capital Cities)	8.00%
KHOU-TV	(Corinthian)	10.68%[16]
KHTV(TV)	(WKY Television)	6.20%

The KPRC and KPRC-TV News Departments have been the recipients of many awards for journalistic excellence. Among them are:

1970 Charles E. Green Journalism Award, (Headliners' Club) For Best TV Spot News Reported

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[16]KHOU-TV's renewal application (Exhibit 9) states that "due to the characteristics of the specific days of the composite week" approximately three-fourths of an hour more of news was programmed than would normally be present in a typical week. For the upcoming renewal period the four stations propose to devote the following percentages of time on the air to news:

KPRC-TV	11.98%
KTRK-TV	8.00%
KHOU-TV	9.90%
KHTV(TV)	5.60%

National Press Photographers' Association, Spot News Film, Third
National Press Photographers' Association, Gen. News Film, Third
National Press Photographers' Association, Team Filming, Honorable Mention
Texas AP Award For Best TV Editorial
Texas AP Award for Best TV News Feature

1969 National Press Photographers' Assn., Best TV News Documentary (For Passage to Prudhoe, NW Passage Trip)
National Press Photographers' Assn., Spot News Film, Third
Texas State Teachers Association School Bell Award For Distinguished Service to Education
Texas AP Award For Best Radio Newscast Over 5 Minutes
Texas AP Award For Best Radio New Special
Texas AP Award For Best TV Editorial
Texas AP Award For Best TV News Feature
Houston Fire Department Distinguished Service Award

1968 Academy of TV Arts and Sciences Citation For "Tell It Like It Is" and Subsequent Series of "Dialog Houston"
Houston Teachers Association Front Line Award For Outstanding Interpretation of Educational Issues
Texas AP Award For The Best TV News Special
Texas AP Award For The Best TV News Feature
Texas AP Award For The Best TV Coverage Of Extraordinary Event
Texas AP Award For The Best TV Newscast
Texas AP Award For The Best TV News Cameraman

Texas AP Award For The Best 15 Minute Radio Newscast
Texas AP Award For Best TV Spot News
Texas AP Special Award For Cameraman (For Coverage of Texas Men in Vietnam)

1966 Academy of TV Arts and Sciences, Regional Emmy For "Guns Are For Killing"
Texas AP Award For Best TV Documentary
Texas AP Award For Best TV Newscast
Texas AP Award For Best Radio Newscast Over Five Minutes
Texas AP Award For Best TV Spot News Film
State Bar Of Texas, Annual Journalism Award

1965 Texas AP Award For Best TV Editorial
Texas AP Award For Best Five Minute Radio Newscast

1964 Texas AP Award For Best Radio News Special
Texas AP Award For Best TV News Special
Texas AP Award For Best Five Minute Radio Newscast
Texas AP Award For Best TV News Feature

1963 Texas AP Award For Spot News Film, TV
Texas AP Award For Feature Newsfilm, TV
Texas AP Award For Best News Special, TV
Texas AP Award For Best TV Newscast
Texas AP Award For Best Radio Newscast
Texas AP Award For Best Radio News Special
National Press Photographers Assn., General Newsfilm, First Place
National Press Photographers Assn., Best Sound On Film, First Place
National Press Photographers Assn., Best Feature Film, Third Place

1962 Texas AP Award For Best 15 Minute Radio Newscast

Texas AP Award For Best 5 Minute Radio Newscast
Texas AP Award For Best Spot Newsfilm, TV
National Press Photographers Assn., Newsfilm Station Of The Year
National Press Photographers Assn., Best Spot Newsfilm (Hurricane Carla)
National Press Photographers Assn., Feature Film, Second Place
National Press Photographers Assn., General Newsfilm, Third Place
Radio and TV News Directors Assn., Best Spot News Reporting For Radio (Hurricane Carla)

1961 Texas AP Award For Spot Newsfilm, TV
Texas AP Award For Public Service, TV
National Press Photographers Assn., General Newsfilm, Second Place
National Press Photographers Assn., Sports Film, Third Place
National Press Photographers Assn., Newsfilm Station Of The Year (Runner Up)

Nearly fifty percent of KPRC-TV's program expenses are devoted to news and public affairs programs.

43. To some extent it appears that the Commission has relied on speculation that commonly owned newspapers and broadcast facilities do not operate within separate journalistic spheres. Here, then, are facts that show the gulf that separates the two branches of the journalistic profession. In Houston, at the KPRC stations, broadcast journalism is a profession and professional integrity is jealously guarded. A factor that the Commission seems to have ignored is that newspaper ownership has, in fact, had a positive influence in the development of that integrity. Common ownership of the KPRC stations with the Post is

responsible, in some part, for the calibre of news operations that has developed at the stations. The Post's owners were, after all, well aware of the necessity for and importance of full, accurate and prompt dissemination in the community of news and information of the community's affairs and are aware of the mass media's role in informing the public. Here, that awareness has resulted in highly professional broadcast news organization. It is not believed that the Commission is blind to the fact that, even now, and even in major markets, "rip and read" and haphazard and less than professional local news gathering efforts exist. Such is not the case at the KPRC stations and never has been.[17] To some extent newspaper ownership and the commitment to a tradition of news and public affairs has contributed to the strength and integrity of the KPRC news operations.

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[17]The seriousness with which the KPRC stations take their journalistic responsibility is best illustrated by Attachment 7, the General Instructions for the KPRC Radio News Department. A comparable detailed and separate set of instructions is also maintained by the KPRC-TV News Department.

[Comments of A.H. Belo Corporation (May 17, 1971), pp. 8-9]

12. Insofar as the Belo broadcast stations are concerned, the assumption underlying the one-to-a-market proposal is contradicted by the facts. The Dallas Morning News and Station WFAA-TV and Stations WFAA AM-FM are operated substantially in the same manner as they would be if each of these properties were separately owned. The news gathering and reporting, the editorial activities and the advertising business of the Morning News are carried on completely independently of WFAA-TV and WFAA Radio. The Belo television station is programmed, staffed and operated independently of WFAA AM-FM. Even WFAA-AM and WFAA-FM are programmed substantially independently of each other although the Commission's Rules would permit WFAA-FM to duplicate WFAA-AM 50% of the time. The Belo stations compete for advertising revenue with each other and with the Dallas Morning News as vigorously as they do with the other radio, television stations and newspapers in the market. Under such circumstances, it is clear that there is no lack of diversity of programming or viewpoints because of the ownership by Belo of a newspaper and broadcast stations in Dallas. So far as competitive practices are concerned, the Belo stations compete with the Dallas Morning News in the same way as they do with the Dallas Times Herald. The Belo television and radio stations compete with each other for audience and advertising revenue as vigorously as they do with other stations in their markets. In the final analysis, how effectively the objectives of the Commission's diversification policy –

competition and diversity of programs and viewpoints – are achieved in a particular market depends not on who owns the media in the market, but on how the media in the market are operated, whoever their owners might be. It is not diversify of ownership, but diversity of programs and viewpoints that are the *desiderata*, so far as the public is concerned. The Commission's rules and regulations which are intended to prevent anti-competitive practices and to promote diversity of programs and viewpoints should be directed to the way stations must be operated, not to who may own them. As the ANPA Comments point out, the anti-trust laws remain available to correct any abuses that might flow from an undue concentration of ownership of media in any market.

[Comments of The Washington Post Company and Post-Newsweek Stations, Capital Area, Inc. (May 17, 1971), pp 2-4]

Autonomy

The "principal purpose of the proposed rules is to promote diversity of viewpoints in the same area . . ." *First Report & Order*: 22 FCC 2d at 313. The Commission also refers to arguments, made without factual support, that common ownership may lessen the degree of competition for advertising or engage in undesirable practices such as special discounts. And the Commission indicates general concern with the possible abuses of undue concentration of economic power.

As a matter of basic ownership philosophy, The Washington Post and the WTOP stations are completely independent of each other. Indeed, the stations and the newspaper compete against each other as if they were separately owned.

The point of contact between the WTOP stations and corporate ownership is at the highest management level where discussions center on general operations, major financial expenditures, overall programming quality and the needs and interests of the community. The stations thus benefit from the experience and expertise of top level company officers, without affecting the stations' complete independence with respect to editorial positions, news and public affairs content and economic competition.

The managements of the broadcast operation and of the newspaper operation are entirely separate.

The sales operations of the stations and the newspaper are also separate and strongly competitive.

There are no joint sales efforts, no combination rates and no combination discounts.[1]

So, too, the news, editorial and public affairs facilities and staffs are independent of each other. News coverage and editorial policies are separately determined. The stations and The Post have taken opposing or differing positions on critical national and local issues. Recent examples include the Philadelphia Plan for minority hiring, the nomination of Judge Clement Haynesworth to the Supreme Court, the D.C. Crime Bill, the construction of dams on the upper Potomac River, highway projects such as the North Central Freeway, the Three Sisters Bridge and Interstate 66, and Maryland Constitutional Amendments. Indeed, the newspaper and the stations have been at odds on issues directly affecting broadcasting. For example, the WTOP stations editorialized against the 1970 campaign spending bill vetoed by President Nixon, whereas The Washington Post supported it.

In short, as Jack Gould, writing in the April 6, 1971, New York Times (p. 97) of the editorial dispute between WTOP-TV and The Post over "The Selling of the Pentagon" put it: "The Post and WTOP-TV pride themselves on their separate autonomies."

It is apparent therefore that divestiture of the Post newspaper or broadcast interests would not add another media voice to the Washington area; indeed, it could well reduce the robust diversity of information and ideas that they provide.

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[1]The sales operations of WTOP and WTOP-TV are similarly entirely separate and competitive, without joint sales efforts or combination rates or discounts.

COMMENTS OF THE PULITZER PUBLISHING COMPANY [May 17, 1971]

The Pulitzer Publishing Company (hereinafter Pulitzer), licensee of KSD and KSD-TV in St. Louis, Missouri, files these Comments in response to the Commission's Notice of Proposed Rule Making in the above-referenced proceeding. The Commission's proposal to eliminate any newspaper-ownership of broadcasting facilities in the same market would not be in the public interest. In support, Pulitzer shows:

1. In 1972, The Pulitzer Publishing Company will complete fifty years as the licensee of KSD and twenty-five years as the licensee of KSD-TV. The broadcast stations have been operated with the same keen concern for public welfare which has characterized publication of the *St. Louis Post-Dispatch.* The Post-Dispatch has been controlled by Joseph Pulitzer and his descendants since the paper was established in 1878. Joseph Pultizer, Jr., Chief Executive of the company at present, is the third member of the family to fill this position.

2. Continuity of management, maintenance of consistent policy and financial stability have been energizing factors in operation of the radio and television stations as well as in publication of the newspaper. Just as The Pulitzer Publishing Company has scored many firsts in journalism with the *Post-Dispatch,* so it has been a pioneer in radio and television.

3. As early as 1904, the company took part in a demonstration of wireless telegraphy at the St. Louis World's Fair. The *Post-Dispatch* set up its World's Fair Bureau at the base of a 300-foot tower. Reporters turned their news stories over to a telegrapher who

transmitted the articles to the newspaper plant four miles away. In another successful test of wireless equipment, a *Post-Dispatch* reporter in 1921 relayed his accounts of a national golf tournament from the St. Louis Country Club links directly to the Sports Department.

4. The *Post-Dispatch* radio station went on the air in 1922, years before commercial sponsorship of programs and paid announcements came into being. KSD was the first radio station to broadcast an entire season of symphony concerts.[1] The first Presidential radio address on a public question was broadcast by KSD.[2] In the 1940's, The Pulitzer Publishing Company experimented with facsimile transmissions in the ultra-high frequency range. KSD-TV went on the air in 1947, when there were only four privately-owned television sets in the St. Louis area.

5. KSD-TV opened a new field in public service television in 1952 when it presented a weekly series of non-denominational programs dramatizing spiritual values. "This Is the Life", produced by the Lutheran Church Missouri Synod, with headquarters in St. Louis, brought KSD-TV an award for outstanding service to religious life. The station has won many other honors. It received a National Emmy Award in 1964 for "Operation Challenge, a Study in Hope", its documentary dealing with the problems in the suburban Negro community of Kinloch. Another award-winner that year was "No Room at the Bottom", a program

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[1] St. Louis Symphony Orchestra season beginning November 11, 1922.

[2] Address delivered by President Warren G. Harding from St. Louis Coliseum June 21, 1923.

stressing the need for vocational training. "The Lengthening Shadow", a documentary produced by KSD-TV in 1966, protested conditions that made the infant mortality rate in St. Louis the second highest in the country. More than 130 hospitals and universities have shown films of this program.

6. To review more than 20 years of public service by KSD-TV would require a volume. Instead, we list some of the programs locally produced in 1970:

"The Black Experience"
A weekly series of discussions planned and executed by members of the Negro community.

"Right to Dissent"
A discussion by two St. Louis attorneys.

"Is the Feminine Mystique a Mistake?"
Opinions expressed by three St. Louis women.

"Campus Unrest"
A discussion by four Washington University students.

"The Drug Scene"
A dialogue between two St. Louis experts and a group of 90 teenagers.

"Bang! You're Dead"
A discussion of gun control in St. Louis.

"Rapid Transit—It's Your Move"
A study of mass transportation in other cities.

"Population Crisis"
An analysis of over-population's effect on ecology.

"Your Public Library"
A report and interview on current acquisitions.

"Taxes—Which Way Now?"
Analysis of taxation principles in the St. Louis area.

"Where There's Smoke"
A discussion by five St. Louis students—a smoker, a reformed smoker and non-smokers.

"The Ride to School"
Personal reactions to busing.

"Commitment to Learning"
A film made at three schools to stimulate improvement in education on the part of teachers and parents.

7. Surely the diversity of opinion provided by these and many other KSD-TV programs is exactly what the Commission is seeking. KSD-TV likewise devotes much time and effort to presentation of station news. The following are percentages of news programming on St. Louis television stations as shown by most recent renewal applications for the Composite Week:

Station	*Hours*	*Minutes*	*Percentages*
KSD-TV	17	28	13.3%
KPLR-TV	3	30	2.9%
KTVI-TV	6	9	4.7%
KMOX-TV	16	15	11.3%

8. The Pulitzer Publishing Company is proud of its broadcast record of community service. Could the Commission expect such a record to be improved – or even equaled - if operations were transferred to others? Could an absentee owner, exercising control from another city, or even a local owner with no newspaper affiliation, offer promise of better service, more willingness to expend time, effort and money on non-revenue programs? Pulitzer does not think so.

9. KSD and KSD-TV have their own news department employing 36 persons, including twelve reporters. While operating independently of the *Post-Dispatch*, the

radio and television stations do have access to the newspaper's reference library, containing 8,000,000 clipings and 2,000,000 photographs. This is an asset sorely missed by a broadcasting station without a newspaper affiliation.

10. KSD-TV was the first television station in the United States to employ a black announcer as a featured performer on a regular program series. This young woman was hired seven years ago, and is still appearing regularly on KSD-TV. The Pulitzer radio and television stations have been powerful voices in the movement to overcome prejudice, and bring full opportunity to minority groups.

11. In the St. Louis metropolitan area there are 30 different owners of broadcasting properties.[3] There is also a great diversity of print media in the St. Louis metropolitan area. In addition to the metropolitan dailies, *St. Louis Post-Dispatch* and *St. Louis Globe-*

[3]Pulitzer Publishing Co., operating KSD and KSD-TV; CBS, Inc., KMOX, KMOX-FM and KMOX-TV; Newhouse Broadcasting Co., KTVI-TV; Laclede Radio, Inc., KATZ Radio, St. Louis, Inc., KSTL; Radio 1380, Inc., KWK; H.S. Schwartz, KXEN; Storz Broadcasting Co., KXOK; Radio WEW, Inc.; Communications Fund, KXLW; Contemporary Media, Inc., KIRL; Belleville Broadcasting Co., WIBV; AVCO, WRTH; Apollo Radio Corp., KACO-FM; Vanguard Broadcasting Co., KADI-FM; University of Missouri, KBMJ-FM; Commercial Broadcasting Co., KCFM; Jeremy D. Lansman & Lorenzo W. G. Milan, KDNA-FM; Foreground Music, Inc., KCRH; St. Louis Board of Education, KSLH; Century Broadcasting, KSHE; School District of Clayton, KHRU; Lindenwood Female College, KCLC; Our Lady of the Snows Broadcasting, WMRY; Thomas N. Evans, KDNL; 220 N. Kings-highway, Inc., KPLR; WIL Music, Inc., WIL and WIL-FM; Luthern Church-Missouri Synod, KFUO and KFUO-FM; Norman Broadcasting Co., WGNU and WGNU-FM; Morell Broadcasting Co., WOKZ and WOKZ-FM.

Democrat, there are six small daily newspapers serving area communities. There are no less than thirty weekly shopping papers providing community news and advertising for their readers.[4] If The Pulitzer Publishing Company were forced to divest itself of KSD and KSD-TV, the 30 ownerships would presumably be increased to 32. Would this small increase in number of owners guarantee any significant further diversification of viewpoint?

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METROPOLITAN DAILY NEWSPAPERS

St. Louis Post-Dispatch (E & S)
St. Louis Globe-Democrat (M & Weekend)
Alton Telegraph (E)
Belleview News Democrat (E)
Edwardsville Intelligencer (E)
Festus News Democrat (E)
Metro East Journal (E)
St. Charles Banner News (E)

METROPOLITAN ST. LOUIS WEEKLY NEWSPAPERS

Argus
Baden News Press
Citizen
Clayton-Ladue Squire
Claytonian-Tribune
Collinsville Herald
Community Press
County Observer
Florissant Reporter
Jefferson County Journal
Kirkwood Advertiser
Naborhood Link News
Neighborhood Times
North County Journal
North Side Community News
Northwest County Journal
Overland Community News
Rock Township Journal
St. Louis American
St. Louis Countian
St. Louis County Journal
St. Louis County Star
St. Louis Mirror
St. Louis Sentinel
South County Journal
South St. Louis County News
South St. Louis Neighborhood News
South Side Journal
Webster Advertiser
West County Journal

12. It should be noted that the Commission's policy in favor of diversity of expression is shared by Pulitzer. However, the Congress and the Commission have already enacted laws and rules which require all applications for broadcast facilities to meet certain separate ownership standards, and preferences are often accorded applicants who demonstrate the absence of other media accorded applicants who demonstrate the absence of other media ownership in the service area. The Commission has considered the circumstances of undue concentration of control of the means of mass communication in individual cases, whenever demonstrated. There is no such concentration in St. Louis. Absent any showing whatsoever that existing rules, regulations and policies have failed to maintain appropriate licensee responsibility or permitted widespread media monopolization, there is no public interest factor which would suggest, much less require, the drastic across-the-board disarrangement and disruption of broadcast journalism contemplated by the proposed rule. Pulitzer suggests its record proves the independence and responsibility newspaper-owned broadcast licensees normally develop under existing regulatory policies designed to promote the public interest.

13. The programming of KSD and KSD-TV has never been subservient to the *Post-Dispatch*. On the contrary, the General Manager of the broadcasting stations has initiated news programs, film documentaries, editorial opinion broadcasts and public service programs on civic matters, independent of the newspaper. As an officer and board member of the company, the broadcasting Chief Executive has maintained the same high journalistic standards as the *Post-Dispatch,* but the day-to-day programming has been directed entirely independently.

Would divestiture of the broadcasting stations by the company achieve a new dimension in the coverage of public affairs? Could KSD and KSD-TV, operating separately and without the solid financial backing of The Pulitzer Publishing Company, afford to employ news staffs aggregating 36 employees? Would their news programs reflect the legwork, intensive investigation and in-depth reporting required by the Pulitzer management? Would they withstand, as a matter of policy, the superficiality of news bulletins ripped off a teletype machine? Would the new owners commit weeks of work to documentary programs producing no revenue? Would they have the resources to maintain the high level of quality recorded by KSD and KSD-TV under present management? The answer to each is a resounding "No". The Commission should consider the effect on employees, if Pulitzer is required to divest itself of KSD and KSD-TV. Many of these employees have been with Pulitzer for many years and a change of ownership could well place their jobs in jeopardy, besides almost certainly ending their future participation in the Pulitzer Pension and Group Insurance Plans.

14. In short, the St. Louis public would lose far more than it would gain if the Commission forced dissolution of the newspaper broadcast combination. Newspaper and broadcast operations should not be subject to arbitrary, blanket condemnation and forced dissolution by the Commission. Newspaper publishers, as with all licensees, are entitled to judgment on their individual merits, considering all circumstances presented. We believe that, judged on individual merit, The Pulitzer Publishing Company management of KSD and KSD-TV, has fully measured up to the high standards advocated by the Commission. Any pre-judgment and

sentence of forced divestiture would be unfair, unwarranted, and not in the public interest.

15. In addition to the foregoing comments detailing Pulitzer's broadcast record and the total absence of need for the proposed Rule, Pulitzer challenges the assumed authority of the Commission to adopt Rules designed to bar all persons of a certain class — newspaper publishers — from ownership of any broadcast licensee. It is respectfully submitted that any such Rule, which penalizes or prohibits lawful business organizations from ownership of communications media, would constitute an unconstitutional restraint upon freedom of expression and business enterprise, well as have the effect of invidious discrimination against a whole industry, contrary to the Commission's public interest mandate from Congress. Pulitzer fully supports the stance of the American Newspaper Publishers Association in this regard.

16. In conclusion, the Commission has stated that the theory underlying the proposed Rule is that a rule is necessary to assure that there will be adequate diversity of programming, and less concentration of control over communications mass media. The problem here is that there has been no showing that there is any concentration of control, or lack of diversity of programming. Instead, by legislative *fiat*, the Commission would deprive the market of free, unfettered competition by those best able to compete.

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